

# PSP 1068- Craigieburn West

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## Part C Submission



14 May 2021



## 1 Introduction

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These closing submissions are made on behalf of the Victorian Planning Authority in respect of the Craigieburn West Precinct Structure Plan (**PSP**). The VPA has presented a Part A Submission, a Part B Submission and a Part B Part 2 Submission that principally responded to the evidence in the case.

These submissions seek now to respond to the position of the parties as they have been expressed and/or modified through the written submissions stage of the hearing.

It is not the VPA's intention to respond to each and every argument of the parties. Many of the arguments have been addressed through the two Part B submissions and where no new issues have arisen, the VPA relies on its previous submissions.

These submissions respond in the manner in which the written submissions have been delivered - by submitter, generally in order of presentation.

## 2 Requested form of recommendations

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The Committee will make a series of findings on the issues in dispute in respect of the matter and associated recommendations. The nature of the case is that many of the issues relate to the proposed drafting of the PSP and ordinance or the locality of discrete items of infrastructure within the PSP. The VPA considers the great majority of submissions are matters capable of being the subject of direct recommendations.

Clause 20(a) of the Committee's Terms of Reference provide that the Committee is to produce a written report addressing '*[w]hether the referred element(s) of the draft amendment or planning permit is appropriate*'. Without seeking to limit the scope of the Committee's power, the VPA requests that, where possible, direct recommendations expressing the Committee's view on the appropriate PSP and ordinance in the matter are provided.

For example, the VPA refers to the locational issue of the proposed government secondary school. The VPA has been direct in requesting that IRD provide a position on an alternate location of the secondary school. This occurred through the delivery of the Panozzo evidence which identified three potential locations of which IRD say Option A is the appropriate location.<sup>1</sup> The substance of the VPA submissions are that none of the alternate locations are superior (and in some cases, even viable) to the location within the consultation draft of the PSP. There was however a faint suggestion in Mr Panozzo's oral evidence that the three locations were general in nature and there might be a wholesale review of the northern portion of the PSP.

A general recommendation to review (in that instance) the school locations and layout of the north of the PSP is strenuously resisted by the VPA on the following grounds:

- The issue is capable of resolution one way or the other. If the Committee does not accept the position of the VPA then it should recommend the northern location.
- A general recommendation to do further work would be unproductive. The need for a school is not in contention and the Committee has the benefit of multiple witnesses on best integrated outcome. A further opinion obtained by the VPA on this matter would not materially assist the issues.
- The PSP is a fast track PSP and an open-ended recommendation would delay the finalisation of the PSP.

It may be that the Committee identifies an issue that it does not agree can be determined on the available information. If this is the case, then the Committee is constrained only by the Terms of Reference in the recommendations that it can make and these submissions do not seek to constrain the Committee. However, it is requested that the first approach explored by the Committee is its recommended determination of the issues at hand.

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<sup>1</sup> Paragraph 42 of the IRD Closing Submissions.

### 3 Hume City Council

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The VPA has, on a line-by-line basis reviewed the Council's submissions and proposed amendments to the PSP and Ordinance.

It has engaged in this lengthy process from a standpoint of seeking to determine where proposed changes will assist the users of the planning scheme, where proposed changes are required and where proposed changes are consistent with the general structure and form of requirements or guidelines adopted in PSPs across Victoria. In response to this, the VPA is proposing to adopt, or adopt in a modified form, a number of the Council suggestions. These are principally detailed in the attached documents and the Committee and parties are asked to carefully review the VPA's position on these matters.

Turning to the issues raised in the Council's written submissions.

In relation to the town centre and the Council's desire to have a plan submitted which details how a development of part of the town centre will integrate with the balance of the centre, the VPA has included the proposed text in a modified application requirement (Please see Part C – Schedule of Proposed Ordinance Changes, Section 3.0 of the Schedule to Clause 37.07). The modifications are considered appropriate for a number of reasons. Firstly, the Council submissions referred to a 'development plan'. The term 'development plan' has a particular meaning within the VPPs. What Council is requesting is not a true development plan but an indicative plan of how a layout for the whole centre could be presented.

The proposed plan would have no statutory role in all likelihood. Rather, it is a decision making or decision assisting tool. To this end the VPA considers it important that the plan responds to the design principles within the PSP for the LTC.

The VPA and Council remain apart on the transport related aspects of the PSP.

As set out in the Part B Part 2 submission and the earlier submissions, the VPA rejects the criticisms of the model adopted by the VPA which has in its second iteration been tailored to respond to the Council's own GTA Technical Note. In this respect it seems that the Council is rejecting its own advice from its own expert. It instead has obtained an opinion from Mr Pelosi which, provides only partial support for the Council's own plan. The Council's advocate sought to distance the Council from the GTA memorandum in relation to traffic generation rates while at the same time seeking to categorise the findings of that memorandum as highlighting a range of serious issues with the VPA's modelling.

To put this in context, Council sought to distance itself from the sensible memorandum that formed the building block of the Council's submission to the process in pursuit of a different expert before this Panel. It is reasonable (and open to the Committee) to draw an inference that that once One Mile Grid undertook its updated modelling, Mr Humphries' opinion was no longer sufficiently strident in respect of the position Council has advanced before the Committee. Certainly, there has been no explanation for Mr Humphries' absence.

In its own time the Committee is asked to return to the Humphries technical note and consider how the Council characterised that note in submissions and what it in fact says in relation to the initial modelling as summarised at Attachment 1 to the note. There are 15 matters raised. 7 are minor, 4 are moderate and 4 are simply comments. No matters raised are a high priority.

On the issue of traffic generation rates the Council has simply miscast the position presented in the Mogprop Tribunal case:

- In the matter the Tribunal was referred to the RTA NSW generation rate of 0.85 movements in the peak (Paragraph 52).
- Mr Walsh had undertaken surveys in the growth area that indicated a rate of 0.7 movements (Paragraph 52).
- In the case for reasons of local facilities in proximity Mr Walsh adopted a rate of 0.63 (Paragraph 53).
- Mr Kirikidis the Council expert in that case adopted a rate of 0.52 (Paragraph 54).
- The Tribunal stated that '*while I consider the rate he has adopted to be broadly reasonable, I do not consider it to be a conservative assumption which may be capable of, to some degree, offsetting other assumptions made by Mr Walsh which I have found may be underestimating congestion at the Heather Grove intersection*'. That is other matters not relevant to traffic generation determined the case.

The spread, consisting of 0.9 adopted by One Mile Grid, 0.85 adopted by the RTA NSW (in Mogprop), 0.7 surveyed by Mr Walsh (in Mogprop) and the evidence presented in this case by Mr Walsh and Ms Marshall lend weight to the position that Mr Pelosi's analysis is substantially conservative at 1.58.

The VPA rejects the criticism of the model and also rejects Council's reliance on Mr Pelosi's overstated generation rates and inconsistent directional plans. The Council traffic plan is unsupported by the VPA and in many instances was not even the subject of a detailed examination by its witness.

The VPA refers to the Council position in relation to Mickleham Road and its duplication. The VPA has set out its position on these issues in its Part B Part 2 Submission in broad terms. The VPA adopt the submissions of Peet at Paragraphs 13-24 in respect of the submission seeking to delay the PSP and in respect of a lot cap (if that be seriously maintained). Council, through its submissions, has not justified these positions and it would be unfair for the Council to benefit by the uncertainty it created when it elected to raise issues but not to resolve them in the running of its case and evidence.

In relation to Mickleham Road, a practical and reasonable suggestion was set out at Paragraph 78 of the Council's submission was presented in the form a proposed objective to the PSP. This was derived from an objective in the Clyde Creek PSP (Ensure that development staging is co-ordinated with the delivery of key local and state infrastructure) that was the subject of the Mogprop decision<sup>2</sup>. The VPA generally adopts that objective but in the form of a specific guideline within the transport section of the PSP (please see Part C – Schedule of Proposed PSP Wording Changes, New Guideline under 3.8.1).

On the issue of tree retention, the VPA does not support the additions to R34 as it considers they make the PSP less, rather than, more user-friendly. Determining what is *unreasonable* in terms of safety, what is *reasonable* incorporation to the public realm and reasonable subdivisional adjustments just creates doubt and interpretative complication. The VPA considers this is not an appropriate change to the PSP.

The VPA has already provided its position in relation to a kangaroo management underpass under Mickleham Road and so accordingly the additional words sought in respect of the UGZ schedule to specifically raise the prospect of an underpass are rejected.

In respect of bushfire, the VPA seems to be somewhat at cross-purposes with the Council and its submissions. The VPA agrees that it is desirable the BCS area is transferred to public ownership. This will assist with the bushfire management of the area.

The Council suggests that Part 3.3.3 of the PSP displaces the operation of section 41 of the Country Fire Authority Act. That may be the case where land development is activated but the PSP will not operate to control bushfire risk on undeveloped parcels. Where a permit application is made for part of a parcel, that permit may reasonably regulate the balance of that parcel under the same control and bushfire management plan. The issue is whether a permit and a bushfire management plan can control adjacent unrelated parcels. It cannot. For this reason, the VPA does not accept the Council's position that section 41 of the CFA Act is displaced because there is no procedure under the PSP (or that has otherwise been identified by the Council) that will manage these latent parcels until such time as they are activated by development and brought within the auspices of the bushfire management plan process within the Amendment.

At Paragraph 56 the Council makes submissions about the roundabouts in the vicinity of the schools. It says they should be signalised and funded by the ICP. The PSP nominates these intersections as 'Controlled Intersections'. A controlled intersection may be a roundabout, signage or an intersection. They may be signalised or left unsignalized. The Ministerial Direction on ICPs specifies the matters that can be funded from a Standard Levy at Table 3. It does not include connector to connector intersections:

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<sup>2</sup> At Paragraph 36 of that decision.

#### Transport construction allowable items

22. A standard levy or a supplementary levy must not be imposed in respect of the development of land within a GAIC contribution area to fund transport construction on an existing declared State road. This does not include the construction of road intersections required to connect a new or upgraded council road to a declared State road, or walking and cycling infrastructure alongside or crossing a declared State road.
23. Table 3 lists the allowable items for transport construction that may be funded from a standard levy.

**Table 3: Transport construction standard levy allowable items**

Standard levy allowable item	
<b>Arterial roads</b>	Arterial roads consisting of two lanes in one carriageway in a road reservation with a width of either 34 metres or 41 metres. This item includes: <ul style="list-style-type: none"><li>• upgrading existing local roads to an arterial road standard;</li><li>• new arterial roads; and</li><li>• provision of walking and cycling infrastructure on each side of new or upgraded roads.</li></ul>
<b>Intersections</b>	Signalised intersections or roundabouts at the intersection of: <ul style="list-style-type: none"><li>• arterial roads; or</li><li>• an arterial road and a connector road.</li></ul> This item includes provision of walking and cycling infrastructure.
<b>Walking and cycling infrastructure</b>	Off-road walking and cycling infrastructure (other than infrastructure normally provided by a developer).
	Signalised pedestrian and cyclist crossings.

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It follows that these intersections are subdivisional works covered by R40. The scope of these works will be the subject of permit applications.

## 4 Melbourne Water

Where Melbourne Water has agreed to changes in the design of waterways and assets through its DSS consultation process (e.g. Stockland), the VPA agrees that the finalised position should be reflected in the PSP.

## 5 Department of Transport

To the extent DOT has requested changes these are reflected in the attached tables.

On substantive issues in the proceeding the VPA observes that the DOT position in respect of Mickleham Road and in respect of the provision of LILO intersections are aligned. It is persuasive that the body responsible for the ongoing management of this important arterial road network is satisfied with the modelling prepared for this PSP and the broader approach to traffic management issues.

## 6 Deague Group

Deague Group make a series of submissions about waterways, drainage and traffic matters.

At paragraph 9 of the Deague submission it is stated that “[i]t should be clear that Deague does not seek review of the DSS through the Advisory Committee process”. Despite this submission Deague has spent a significant amount of time arguing the purported benefits of specific drainage amendments and outcomes. Notably however, and contrary to the position it advocates to the Panel, Mr Milner, Deague’s very experienced strategic

planning expert, is comfortable that the PSP can address changes to waterway design utilising the usual notations on the relevant plans. The Deague position on uncertainty and the need for the Panel to address drainage now, is not supported by their strategic planning witness.

The VPA has made comments on the scope of Mr Beardshaw's qualifications and the scope of evidence that he produced in relation to planning matters and costs. Deague say 'Mr Beardshaw is well qualified to express a view as to the likely cost of a drainage asset'.<sup>3</sup> The point is however that Mr Beardshaw did not provide evidence of the cost. He made a broad unsubstantiated comment that drainage may be 'prohibitively expensive' which, in the absence of actual information, could not be tested. Indeed, Mr Beardshaw agreed he had not prepared costings! It is not sufficient that a witness on an issue of fact such as costings or direct experience said to be had with permit applications, provides no detail of those matters. Having heard the Deague criticisms of the VPA commentary on Mr Beardshaw, the VPA maintains its criticisms.

The heart of the matter is found at paragraph 22 where Deague seeks recommendations that this Committee make decisions on the waterway configuration. This is unreconcilable with Paragraph 9. For all of the reasons set out in the VPA's previous submissions, this should be resisted.

Alternatively say Deague, it is said that the PSP should allow for the prospect of the tributary being deleted. The Committee should not be tempted in this regard. Changes to the tributary configuration, construction methodology and indeed existence of a tributary, will be implemented at the time that Melbourne Water approves such changes. This might be at the time the DSS is struck or at a later time when Melbourne Water approves a functional design. There is no reason to elevate this tributary above any other drainage matter that is under consideration by Melbourne Water at this time.

At paragraph 33 (and apparently contrary to its opening position at paragraph 9) Deague is critical of Melbourne Water for not addressing technical matters of drainage before the Panel. That is not the Panel's job and the position taken by Deague is entirely inconsistent with the role of this Committee and the separate role of the DSS.

As Mr Milner agreed, these are changes that can be made during implementation.

The second issue the VPA wishes to address in respect of the Deague submission is the inclusion of Marathon Boulevard as an ICP project.

In truth the submission is only faintly pressed with limited time and oxygen provided to it. At paragraph 72 it is asserted that the property is significantly encumbered by open space which may considerably delay development of the land parcel. The VPA asks the following questions: what is significant in this context, what is the cost of the infrastructure required, and what is the viability of the development of that parcel without inclusion in the ICP? No material has been advanced either in evidence or, now, in submission to support what are bare assertions. In fact, the only expert evidence called to support the notion was Mr Walsh, who only viewed the issue locally and who only has expertise as a traffic engineer.

At paragraph 73 Deague identified correctly that the Ministerial direction on preparation and content of ICPs, allows culverts and connector roads where land fragmentation makes delivery difficult. Firstly, the Committee has no submissions nor evidence on whether this land is fragmented land. All land is divided in the way that the cadastral divides it and can be said to be fragmented 'in a sense. But is an 8 Ha property fragmented?

Secondly, and with reference to the material above, what evidence does this Panel hold that implementation by the developer will be difficult. Respectfully there is none, and it follows that the Committee cannot recommend inclusion of this matter into the Precinct Infrastructure Plan and ICP.

## 7 Stockland

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The Stockland submission raises a relatively small number of matters to which the VPA needs to respond.

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<sup>3</sup> Paragraph 50.

## ***Melbourne Water DSS***

Melbourne Water has, through its consultation process, agreed to make amendments to the draft Aitken Creek Drainage Services Scheme. It is therefore appropriate that these changes are reflected in the PSP. This is consistent with the position that the PSP should reflect the DSS (or draft DSS) as at the date of gazettal of the PSP.

A recommendation is sought that the PSP is updated to reflect the agreement described at Page 9 of the Melbourne Water submissions dated 10 May 2021.

## ***Depiction of the BCS***

The VPA does not agree that the BCS should be shown in an unapproved modified form for the reasons set out in its previous submissions. Further to those reasons, the VPA can indicate that it initially sought to recognise the alternative layout in the PSP as a pending alternative. The PSP is unable to pre-empt a decision regarding the BCS realignment. While the VPA fully comprehends that the BCS amendments are likely to be approved and the superficial attraction of 'pragmatically' depicting the pending location, it is not practical from an approval standpoint. It is further not practical from a statutory viewpoint as it creates an unwarranted risk that permissions will be granted premised upon an uncertain outcome in respect of the BCS boundary.

It is understood that if the boundary change is not finalised an administrative amendment will be required to update the PSP. This is the VPA's preference and the appropriate practical outcome as it represents the agreed position with the Commonwealth.

## ***Open Space***

Open space network changes to three linear parks are proposed.

The VPA supports the deletion of GL02 on the basis that the credited open space of 0.3Ha is redistributed within the same property.

The VPA supports the realignment of GL03 in the manner depicted in the Stockland submission.

In the event that the BCS does not change, and there is no consequential relocation of SR-01, the VPA agrees with the deletion of GL01. The active open space in its current location provides a visual green link through the precinct and is likely to itself have paths within it. In the case of deletion, the area of credited open space would be redistributed within the Stockland land.

In the event that the BCS does change (with the consequential relocation of SR-01), the VPA does not support the deletion of GL-01 and instead seeks a recommendation that GL-01 is relocated to the western side of the north south connector. The recommendation is sought not on active transport principles as Stockland correctly identify that the boulevard connector can meet these needs, but on the basis that it will provide the continuous green link, which represents a key urban design feature of the precinct.

## ***Apportionment of active open space and community facilities***

Stockland presents submissions on the equitable apportionment of SR-01 and CI-01 between Lindum Vale PSP and Craigieburn West. In particular, they are concerned that there exists a funding gap in respect of the two areas.<sup>4</sup>

When considering equitable contributions, it is first appropriate to consider overall PSP provision if it is assumed that:

- Lindum Vale funds 4.0Ha of active open space and 0.4Ha of community infrastructure land.
- The 'gap' identified in the Stockland submission is met entirely by Craigieburn West.

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<sup>4</sup> Submissions Page 21.



In Lindum Vale:

- The total NDA is 102.09 Ha.<sup>5</sup>
- The average minimum dwelling density (Lindum Vale had a number of interface treatments to meet the Interurban break) is 16.5 dwellings per Ha.
- The total minimum dwelling yield is 1,685 dwellings.
- Active open space of 4Ha is provided and funded at a rate of 421 dwellings per Ha.
- The community centre is funded at a rate of 4213 dwellings per Ha.

In Craigieburn West<sup>6</sup>:

- The total NDA is 414.31Ha.
- The average minimum dwelling density is 20 dwellings per Ha.
- The total number of dwellings is 8,286 dwellings.
- Active open space is provided at a rate of 436 dwellings per Ha (19Ha), but relevantly is funded (15 Ha<sup>7</sup>) at a rate of 552.4 dwellings per Ha.
- Community centre land is provided at a rate of 3,452 dwellings per Ha but is funded (2Ha) at a rate of 4,143 dwellings per Ha.

It can be seen from the above that the rate of funding for community infrastructure land on the basis of the two assumptions above is very close and in the VPA's view, equitable between the two PSPs.

It can be seen that in respect of active open space the rate of funding within Craigieburn West is distributed more broadly - this means that on a per dwelling basis the costs are lower in Craigieburn West.

On the basis of the analysis above, the VPA does not regard there to be any inequity for Craigieburn West if it funds the 'gap' in relation to Lindum Vale. The northern PSP is 'pulling its weight'.<sup>8</sup>

The next question is whether there exists any other unfairness if Craigieburn West fills the 'gap'.

The Craigieburn West PSP is designed to provide a total of 10.08% of net developable area as credited open space within the PSP. No expert has taken issue with the extent of open space to be provided – to the contrary the Panel is in receipt of direct unchallenged evidence that the overall provision of credited open space is acceptable.<sup>9</sup>

The precinct land use budget<sup>10</sup> identifies that the credited open space totals 41.78 hectares of a total NDA of 414.31 hectares. 19 hectares of that is attributed to the two 9.5 hectares open space facilities – that includes the 4.0Ha funded by Lindum Vale.

The physical provision of land which will be equalised and funded through principally Craigieburn West, but in part Lindum Vale, is consistent with the 10% of NDA total credited open space comprising passive and active open space within the PSP Guidelines.

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<sup>5</sup> Page 15, Lindum Vale PSP.

<sup>6</sup> As in the consultation draft.

<sup>7</sup> 4 Ha funded by Lindum Vale.

<sup>8</sup> It is also noted that the Merrifield West PSP has active open space in the south so that actual level of use is likely to be lower.

<sup>9</sup> E.g. Clarke.

<sup>10</sup> Table 1 of Craigieburn West PSP.

Stockland, who will accommodate SRO1, will be providing 9.5 hectares of land for which they will receive 9.5 hectares of land equalisation credit.

The balance of landowners will, through their various contributions, 'pay' for only 5.5 Ha of the total 9.5 hectares, with the balance met by Lindum Vale. This means that while the PSP provides the appropriate amount of land (and no more) the actual equalisation rate paid for by Craigieburn West is based on 9.1% of NDA rather than the full 10.08%.

In the ordinary course were there no apportionment with Lindum Vale the whole amount would be met by the Craigieburn West developers. In short, the PSP provides no extra land overall compared to the PSP guidelines but derive a beneficial contribution rate.

Lastly, because both ICPs are standard levies, and in any case community infrastructure provision is capped, no party pays more per Ha.

For all of the above reasons the VPA considers it is fair and appropriate that the Lindum Vale contribution remain as per the Lindum Vale PSP and ICP and that Craigieburn West fund the balance of the active open space and community facility.

*Left in Left out*

In its Part B Part 2 submission the VPA presented submissions about a LILO intersection at the BCS. The VPA has listened to the submissions of Stockland that this intersection may be located some way further south and accepts the submissions have merit.

## 8 PEET

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In respect of the PEET submission, the VPA only makes two observations both in relation to the intersection with Cookes Road.

The Committee is in receipt of the specific transport and drainage evidence that goes to the location of this road. The VPA position is that based on those matters and on the later submission of DoT, that the Cookes Road realignment is firstly, viable and secondly, preferable in terms of the management of traffic around Cookes Road and in and out of the PSP. DoT's submission specifically indicated that signalization could be phased to give greater priority to the busier legs of the intersection, and this seems to address the principal concern raised by Mr Walsh.

A second issue has been raised by PEET in respect of the intersection location; that there may be a need for the removal of native vegetation that would trigger approval under the Environment Protection and Biodiversity Conservation Act 1999<sup>11</sup>. At PDF page 24 of 67 of the 21 April Biosis report a patch of Natural Temperate Grassland of the Victorian Volcanic Plain is identified to the north of the Cooks Road entrance on the eastern side of the reserve (and outside the scope of the MSA).

The VPA makes the following observations about this report:

- While this is expert material, it is not expert evidence before the Panel which has been through the usual rigor of testing etc. This is a factor that goes to the weight of the material.
- The vegetation identified on the diagram that has been provided does not, as a matter of fact, necessarily intersect with the continuation of elevation boulevard. The intersection is not designed, the Committee does not have templates, etc. The report only identifies the environmental characteristics and does not consider the potential revised location.
- Thirdly, just because vegetation is a listed community does not necessarily mean that its removal will trigger a need for EPBC permission. EPBC permission is necessitated where there will be a significant

impact on a matter of national environment significance. The Committee is not armed with any assessment as to what if anything would be removed and whether it would trigger EPBC Act approval.

Put together, what this means is that the more recent information from PEET should not be determinative or influential in the Committee's assessment of the appropriate alignment of the road. The VPA is content that the Committee will consider the other relevant information and determine whether the traffic, design and drainage matters support the relocation.

## 9 Pask Group

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The Pask Group submission raises issues concerning the location of the north south connector road, the primary school location in the LTC, local parks and the density requirements within the walkable catchment.

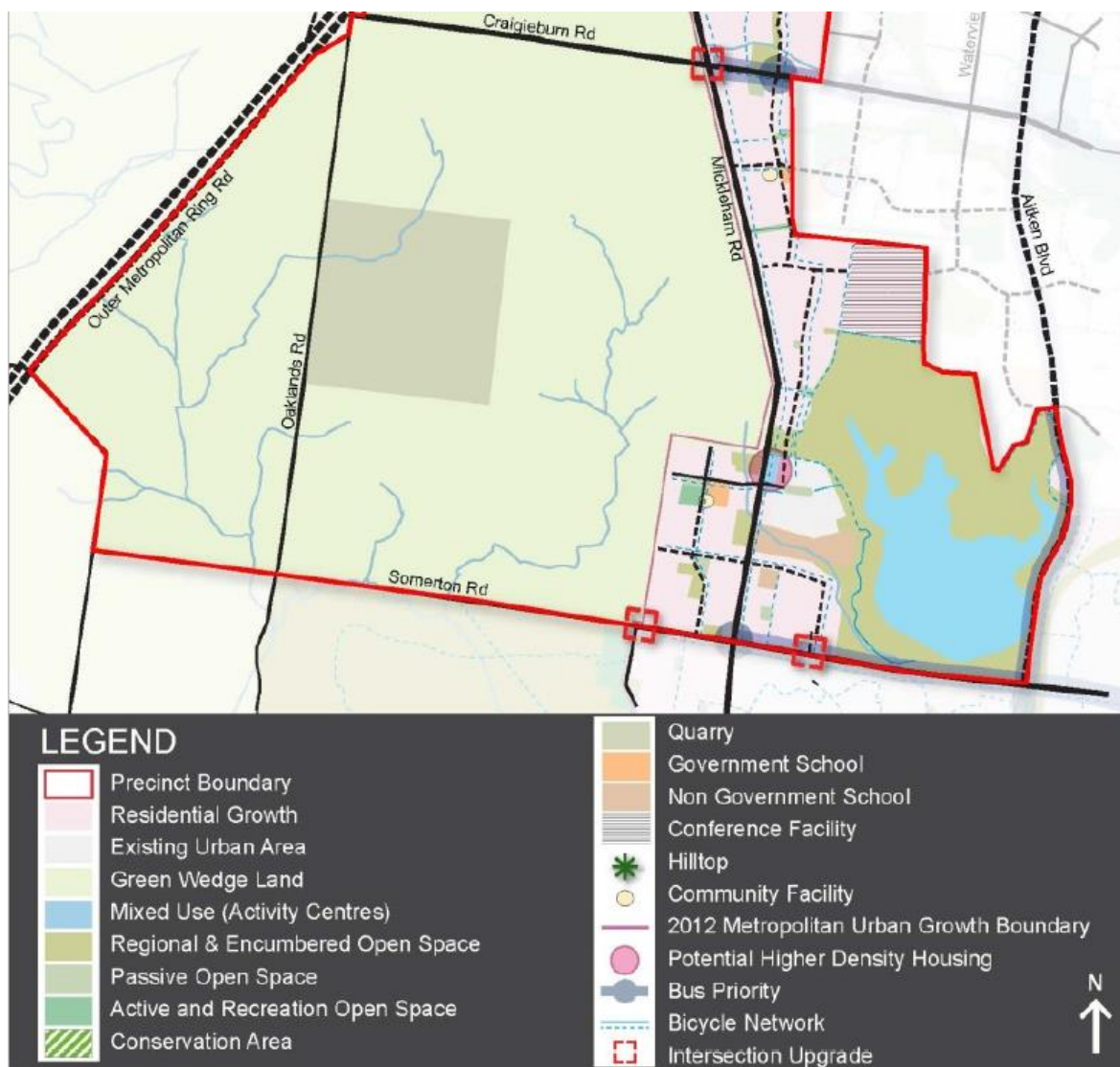
These Part C submissions include a comprehensive analysis in relation to the density provisions under the Henley Developments response and those submissions are adopted here.

In relation to the connector road the VPA has already agreed to its relocation.

In relation to the primary school location, the VPA acknowledges that this is a difficult planning decision. Despite the submissions of the Pask Group to the contrary, the feedback from Department of Education during the preparation of the PSP was that it did not prefer a creek interface location. Further while it is a lower order issue it has a preference for acquisition from a single title. From the VPA's perspective, it considers that the Mixed Use Zone interface provides a viable and useful creek interface with high amenity and passive security when compared to a school. The VPA reconciles this balance in favour of the current layout and the road can be amended to accommodate that.

Recognising the nature of submissions, if the Committee did not accept the VPA position and the school was moved north to the creek frontage, the VPA would propose that the Mixed Use Zone land be relocated to the south of the connector road that abuts the southern boundary of the LTC. This will permit either residential or mixed use development in this location.

The VPA maintains its previous position in relation to parks and in relation to LPO9, LPO6 and LPO8. It is simply not correct and nothing in the submission persuades the VPA that a proper reading of clause 56.05-2 means a 1 Ha park must satisfy the provision. In the VPA's assessment it would also not satisfy Clause 55.06-1. The VPA continues to hold this view having regard to the specific strategy in the Hume Planning Scheme, and the HIGAP strategy. The VPA was not in a position in the time available to take the Committee to all aspects of the HIGAP report but now extracts plan 4.5 from Page 64 of the HIGAP which relates to the Mickleham West area (which includes the PSP) which, in addition to the words extracted in the Part B Part 2 submission, identifies a large local park in this location.



There is strong strategic support for these parks in the currently proposed location.

Lastly, in relation to the local park, the Biodiversity Conservation Strategy is an irrelevant to consideration in the location of the local park.

## 10 JAK Investment Group

JAK make submissions in respect of Property 8 within the PSP. Not inappropriately, JAK are seeking to maximize the developable area on that land. However, the land is subject to various constraints. These constraints include drainage constraints, linear park constraints and commercial (or practical) constraints represented by accommodating the existing temple on the site.

It is not the task of the PSP to address obvious constraints with the Land. These are issues that are planned for at the time of securing an interest. For example, the location of the linear park in this location to accommodate trees in another outcome that is based in policy (we refer to the VPA's HIGAP references). The potential for retention of trees throughout the precinct and their integration into the broader open space network throughout the precinct was obvious in the prevailing policy.

The Parcel specific land use budget (Page 53) confirms that Property 8 has an NDA of 71.93% of the total area of the property against an overall precinct NDA of 74.05%. This suggests the NDA of this lot closely accords with the precinct average.

There is no warrant to consider changes to the PSP on the basis of equity.

JAK are seeking to implement changes to the waterways through its site. There is no utility to granting this request in this process. Melbourne Water will still be required to determine the appropriate drainage outcome and confirm its DSS for the area. In support of the request changes JAK rely on Rain Consulting:

- Who did not provide evidence.
- Are understood to be engaged directly with Melbourne Water in relation to the draft DSS.

For the reasons set out in other submissions, it is not appropriate for this Committee to recommend changes to the PSP in the way that JAK proposes. The Committee should only adopt changes that are confirmed as being accepted by Melbourne Water as part of the future DSS.

The VPA refers to JAK submissions about open space and the ability to realign the linear open space provision. The VPA agrees that some flexibility in this regard is warranted and accepts the proposed changes to G42.

## 11 SFA Developments

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Henley oppose the density target of 25 dwellings per hectare as it is *'too high and not justified on the evidence'*. It is said that if it is adopted, it will result in a *'poor urban design and an inferior housing product that will not meet market expectations in the short to medium term. This in turn will seriously compromise the viability of establishing a local town centre'*.

The Henley position above is based on a number of assertions which cannot be left uninterrogated:

1. Density is too high.
2. Density is not justified on the evidence.
3. Poor urban design.
4. Inferior housing product that will not meet market expectations.
5. Compromise delivery of the town centre.

The density within the walkable catchment is not too high. Firstly, it is appropriate to consider what evidence the Panel has that the density requirement of 25 dwellings per hectare within a walkable catchment is too high. Mr Clarke adopted a figure of 22-23 dwellings per Ha. This was a product of his instructions. In answer to a question of why 22/23 and not 25 this was the only support he could provide. Mr Fetterplace proposes 'minimum average density provisions' of 22-25 dwellings per Ha in the walkable catchment.<sup>12</sup> His evidence tentatively suggests problems that 'may' occur. He states that there 'may result in negative urban character outcomes and fail to meet the market in the short to medium term'. His evidence did not go to any specific examples to support this possibility.

To make the line clear, the VPA proposes minimum densities of 25 dwellings per Ha in the walkable catchment. The experts called suggest 22-25 dwellings per Ha. This is a very fine line and there is no objective analysis to support the contention that it is too high through the addition of a further 2-3 dwellings per Ha. It is either Mr Clarke's instructions or Mr Fetterplace's *potential* issues.

In fact, the principal attack on the 'too high' argument came from policy. As the VPA Part B P Part 2 highlights, policy provides *minimum* targets around a conceptual planning strategy of increasing the number of people living in areas of high amenity. 25 dwelling per Ha is consistent with the policy.

The VPA is criticised for referring the Panel to Liveable communities document. The VPA has not suggested that it is part of the Planning Scheme. However, it did ask both Fetterplace and Milner whether it was relevant and they confirmed it was.

Lastly, the VPA observes that the last two PSPs have addressed walkable catchment densities at 25 dwellings per Ha. These Panels left little to chance, cumulatively spanning approximately 45 days of hearings. The VPA rhetorically asks this Committee whether the evidence has justified a lower rate of 22-25 dwellings per Ha?

The 'too high' and 'not justified' arguments are simply not made good on the evidence.

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<sup>12</sup> Paragraph 140 witness statement.

The next argument is the 'poor urban design' argument. This is a lazy argument in the VPA's view. Urban design can be poor on big buildings and small buildings alike. Good design addresses good urban design. Neighbourhoods can be bland and repetitive at all kinds of densities. Neither Mr Fetterplace nor Mr Clarke offered any evidence of examples where a density of 22-25 dwellings per Ha has produced a demonstrably better urban design outcome than 25 dwellings per Ha. In truth, the VPA is not sure they could. Even if there are examples of bad design, bad design can occur at any density.

The evidence presented does not make the poor urban design outcome allegation out.

Neither Mr Fetterplace nor Mr Clarke hold themselves out as economists or property market specialists.

In the same way there is nothing but assertion that a minimum 25 dwellings per Ha will produce inferior product or product that will not meet market expectations. It may not be the preference of these particular developers<sup>13</sup> (perhaps it takes longer to sell or requires the application of greater care in design) but returning to the principles of PSP planning that were put to Mr Fetterplace – the views of the current owners is not the driving point in preparing a place based plan.

What can be said is, as the VPA has demonstrated, it is a density that is being delivered elsewhere in growth areas and which is planned for in other growth areas.

The 'inferior product and market expectation arguments are not made out.

Lastly it is asserted that the proposed density of a minimum of 25 dwellings per Ha as compared with a density of 22-25 dwellings per Ha will compromise delivery of the town centre. The Committee might reasonably ask itself, what economic analysis it has before it, either in evidence or submission that defines a market, explains the thresholds for delivery of a town centre, outlines a competitive framework for the area. The answer of course is none.

In a short search, the VPA identified a number of examples where the town centre has gone first. It led with this in advance of other submissions. Nothing in those submissions sensibly rebuts that material.

The compromised town centre delivery argument is not made out.

The VPA submits that the density provisions proposed are fair, implementable and consistent with planning policy. No changes are required to the density provisions.

The VPA has now considered Fetterplace position on the form of the walkable catchment. The exhibited walkable catchment was a radial catchment. This is consistent with a number of PSPs, such as those put to Mr Fetterplace by counsel for Deague. However, the VPA considers that the north south extension of the walkable catchment has merit.

The VPA notes that the radius to the south east is approximately 400 metres from the primary school and so a greater distance from the LTC.

The VPA proposes to:

1. Reduce the walkable catchment to the west by setting it back 90 metres from Mickleham Road (a Part A change).
2. Refine the south eastern walkable catchment on the basis of the principles established.
3. Redistribute these area (in a no net change basis) to the north opposite SR02 and the secondary school on both the west and east sides and to the south adjacent to LP09. The VPA estimates that the depth of these areas will also be in the order of 90 metres. This constitutes a functional development distance.

It seeks a recommendation that the walkable catchment is reduced by approximately 90 metres in the western extent and the south eastern extent is refined and that this area is redistributed to the east and western abutments of the government secondary school and SR02 and LP09.

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<sup>13</sup> And certainly is in the case of Pask.

In respect of traffic issues, the VPA's recollection of the evidence differs from that summarized in the Henley submissions. Ms Marshall undertook a SIDRA analysis of the benchmark designs. As was described in the VPA's submissions the benchmark designs are indicative only – there is a problem with assuming that it is the actual design – the purpose is to confirm land take. It was put categorically in submissions for Henley that the connector intersection with Mickleham Road would require 2 left-out lanes. The evidence that the VPA heard from Ms Marshall was that there *may* be a need for a second left-out on to Mickleham Road. The Panel will have its own records but the VPA asks that it check how it heard this particular exchange.

Henley suggest that there must be a further two LILLO intersections north of Craigieburn Road. The VPA considers it is likely that there will be further intersections, but their location is ultimately a matter for the permit application process. At this stage there is no strategic justification. It is convenient at this point to note that this is consistent with the DOT submission.

The second traffic issue is the re-orientation of the North South Road through the Pask land. Contrary to the submissions from Henley that the traffic impacts were not considered, it was put to Mr Walsh that either of the two options would work from a traffic perspective (with which he agreed) and Mr Walsh did indicate that the priority where the North South Road links with the Henley connector would be a matter that could be designed.

Lastly, the PSP does not control the Mickleham Road interface. It only controls the land within the PSP. It is appropriate that the interface cross section and R4 are included within the PSP to ensure that irrespective of management within the arterial road reserve an acceptable amenity outcome is achieved.

## 12 IRD Developments

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The Committee are in receipt of detailed submissions from parties in relation to the relocation of the school proposed by IRD. Having heard the submissions of IRD, the VPA is unpersuaded that the relocation of the school is appropriate.

Firstly, it is necessary to correct the record in two respects.

To the extent that it is suggested that IRD have not been appropriately consulted in respect of the secondary school location, it is the process of exhibition of an amendment that would constitute consultation. Here, that process has been replicated. While the VPA arranged the co-design workshop its purpose was to 'inform'<sup>14</sup> the preparation of the PSP, not to bind it. Indeed, it would be dangerous for the Committee to import such a requirement.

Reliance is placed by IRD on the outcomes of the co-design workshop and the extent to which it contemplated a primary school in the northern portion of the PSP. The school was a potential relocation of 'Mickleham Primary School' in the north west corner of the PSP as at that time, DET were contemplating relocation of that school. DET have since supported the retention of Mickleham Primary in its current location and allocated funding for its expansion and redevelopment.

As stated in the VPA Part A submission<sup>15</sup>, *'the need for the school was identified after the co-design workshop and, accordingly, the location was determined in consultation with DET at that time'*. The relevance of the Co-Design workshop in this context is particularly limited.

The VPA is criticised for the dwelling numbers it has produced in relation to the 1.5km radius circles of the proposed PSP site and the Panozzo site. It is important to observe that Mr Panozzo was asked whether this dwelling density is the appropriate measure to determine which site was preferable in terms of serving the population. What the VPA has done is to apply the methodology put forward by Mr Panozzo to determine which site would serve more dwellings and accordingly more people. In the determination of equity, the site that provides coverage to the greatest number must be a relevant consideration.

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<sup>14</sup> Page 4, Co-Design Workshop Report at 1.2.

<sup>15</sup> At Page 46.



The diagram which informed the numbers in the VPA's Part B Part 2 submission is presented in Appendix A. The VPA has excluded undevelopable land and included land that can be developed at the rates nominated in the PSP. Importantly, the analysis that the VPA prepared demonstrates that it is not a marginally greater number of dwellings in the southern location but a significant number of around 2000 dwellings.

IRD seems to afford weight to the VPA's statement that Mr Panozzo is a pre-eminent expert in determining the number and type of community facilities required in a PSP. The VPA is deliberate in limiting their recognition of Mr Panozzo's skillset. The determination of number and type is a mathematical population-based process. If it is not plain, the VPA wishes to make it entirely clear that it does not consider Mr Panozzo holds relevant expertise to determine the preferable school location on an integrated planning basis.

At Paragraph 40 IRD suggest that the VPA left its analysis of locational attributes to the Part B Part 2. In fact, these matters are directly addressed in both of the Part A and Part B submissions. Mr Panozzo himself sites the Part A content.

The VPA adopts the submissions of Stockland at Paragraph 60 on the town centre location, identifying some of the reasons why the PSP guidelines encourage proximity between schools and town centres.

Lastly, the VPA adopts, in addition to its own submissions, the analysis put by Council in respect of the open space.

## 13 Porter Davis

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Porter Davis raise issues localised to their property in the west of the precinct.

The first issue is a request to fund a Mickleham Road culvert upgrade. In respect of the Mickleham Road culvert the VPA considers these to constitute local development works and not works that benefit either the broader catchment nor works that ought be the subject of an ICP. They are addressed at R40 and should be met by the developer.

Porter Davis (at paragraph 33 of its written submission) suggests that trees identified for retention on the PSP plans should be removed where the trees interface with the indicative location of the extension of Elevation Boulevard and the drainage facility. The rationale supporting this is that either the drainage or a road will impact those trees hence their retention will not occur.

The VPA does not agree. The level of the PSP is a plan at a level of general accordance. Trees to be retained and trees to be removed will be determined at the time that works are completed pursuant to permits to be granted. There is no additional administrative burden or permit applications required as all of these matters will be addressed through a single approval vehicle being a permit. The VPA regards any request to pre-emptively approve the removal of trees across the PSP on the basis of the draft plan as being inappropriate.

Porter Davis propose a small change to the north-south connector. In circumstances where this small change is proposed in the context of broader changes, the VPA does not object to the change.

Porter Davis seeks to include further requirements to ensure that there is flexibility such that the water treatment facility in the gap catchment can shrink if detailed design supports this. However, it is not necessary having regard to the content of R11 and R12 for there to be further amendments to the PSP to facilitate it. Drainage facilities and treatment facilities are sized through detailed design to the satisfaction of the relevant authority. This will then determine the necessary land take.

## 14 Satterley

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Satterley makes submissions in relation to land at the north and at the south of the PSP.

In relation to the southern land, Satterley makes two requests. Firstly, it requests that its approved internal road alignments are reflected in the VPA's road alignments within the Craigieburn East PSP. This is logical and the VPA accedes to this request. A recommendation is sought to this effect.

Secondly, Satterley is critical that the VPA has been "somewhat vague" about the preparation of the Greenvale North Part 2. The criticisms are unjustified. The VPA, each year, receives an endorsed work program that



prioritises projects across all of the growth areas of Melbourne, infill developments within Melbourne and a range of regional projects. Currently the project in question forms part of the work program as a “pre-commencement” project.

The nature of the submission is that in addition to representations already being made by Satterley to the VPA, and presumably to others, Satterley would like this Committee to provide it with assisting words so that it can seek to elevate the project beyond the pre-commencement stage.

The difficulty with this submission is that this Committee is not presented with a holistic view of the priorities for projects across all of metropolitan Melbourne and elsewhere. It is not presented with the basis upon which projects are selected. It is not presented with information that would suggest that a delay in the short term of development in the south of the PSP would have any impacts upon the provision of housing across the broader growth area in the short or any other term.

In short, the Committee is provided with limited information and should refrain from providing commentary of the nature sought.

In respect of northern issues, Satterley identifies an intersection apportionment to which the VPA has already agreed.

The final issue from Satterley relates to active open space. The issue is that the relocation of the active open space, were it to follow the proposed BCS alignment, would take that active open space off Mt Ridley Road. While this is true in fact, the submission does not identify any strategic reasons beyond the fact that the northern location was acceptable at the time of previous planning (and may still be acceptable today). However, the proposed relocation is also acceptable and would serve to collocate these items. The relocation will have no material impact upon the development of Satterley to the north and the distance in any relocation, in terms of access to open space, is best described as marginal.

The VPA supports a position whereby should the BCS relocate, the active open space SR-01 would relocate accordingly also.

## 15 Australia Pacific Airports

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Melbourne Airport referred to the VPA submission to the MEASSAC in relation to planning controls. The APAM submission quotes the VPA submission as follows:

However, the VPA is not aware of clear documentation of this limitation in the Victorian planning system. This can impact the efficient preparation of planning scheme amendments and subsequent development applications. Building and biodiversity matters have, to varying degrees, integrated Commonwealth and State regulatory regimes. The Obstacle Limitation Surface, as it affects development, would appear to be an appropriate candidate for some level of integration with the Victorian planning schemes. The committee should consider the prospect of integrating such a tool in the Victorian Planning system [Emphasis Added]

The VPA submission seeks MEASSAC consider the possibility of a tool for integrating OLS in the Victorian System. This is entirely consistent with the approach suggested by the VPA to this matter. The VPA has submitted that there is a process on foot, that process is addressing the same subject matter as the airport’s proposed control, and that it is not appropriate to create controls (which have not been supported by any tested evidence) while that process plays out and is integrated holistically into the Victorian Planning System.

Indeed what the Panel at Lindum Vale said, in part, was:

Finally, the Panel notes that the issues raised by Melbourne Airport are likely to affect future PSP areas, and it would be useful if the VPA, relevant Councils and Melbourne Airport discussed how these issues might be consistently addressed and whether the existing airport related planning scheme controls might need to be augmented.

That discussion is captured by the MEASSAC hearings and the expected outcomes of that matter. As to the present PSP, the VPA is adopting its approach in this PSP directly from the recommendations of the Panel at Lindum Vale.

No change is required on account of these further submissions.

The VPA observes that the Melbourne Airport is not a referral authority but a party who obtains notice of relevant permit applications. Notwithstanding this, it is relevant to consider what the complaint of the Airport is to this process. Whether the Airport got notice of an application or not, is not a strategic failure, it is, if the point is made good on the facts, an issue of statutory implementation of a strategic plan. The airport's enquiries should practically be referred to the Council.

The airport suggested that it is no seeking substantive controls in the PSP area. Respectfully this is incorrect. We refer the Committee to the structure of the provisions found at paragraph 36 of the submission. They require that:

- By virtue of a mandatory requirement to obtain Commonwealth approval of a permit application proposal prior to lodgement of the permit application. In the context of a planning permit, this means that approval must be sought for a proposal rather than for the approved development which may differ from the proposal.
- The Airport is seeking companion application requirements in the ordinance.
- Under paragraph 36e, a mandatory requirement is sought that any property within the N-contours must have noise attenuation.
- A guideline that any property outside of the N-contours must have regard to noise impacts.

The Committee is not in receipt of any tested evidence relating to these matters. It does not know the extent to which the specific content of evidence presented to another committee will be accepted. It does not know the extent to which different N-contours may require different noise attenuation. It does not know the impacts of these controls.

In every respect, it is simply premature to proceed with the controls proposed by the airport.

## 16 SVR2

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SVR2 control land at the northern corner of Craigieburn and Mickleham Road.

It contends that the land has a relatively poor amenity at this future intersection of primary arterial roads and therefore should be identified for an alternate use such as a service station, medical centre or associated activities. The applied zone will be the General Residential Zone. The General Residential Zone permits the uses that the submitter is seeking.

The question for the Panel is therefore whether it is necessary or otherwise desirable to identify this site for non-residential uses.

The identification of one non-residential use in one part of the PSP can be used to draw an inference in respect of other potential permissible non-residential uses in applied residential zones. For example, if potential medical centre activities or service station activities are identified here, what if a meritorious application is presented at another location? It is likely that the Council or some other person may point to the identification of this site on the PSP as a rationale for not fully investigating any alternate site.

With this in mind the, VPA on balance does not accept it is appropriate to identify this location as a preferred location for a centre of the nature proposed. It is instead appropriate that the PSP provide only bare guidance and that it allows the applied zones to do the work that the VPPs perform in other areas of Victoria.

The alternative position put by SVR2 is a further proposed Guideline 70 that effectively states that facilities of the sort proposed may establish as arterial road intersections subject to traffic access. The VPA does not accept this change on the basis that it does not want to encourage such uses because they may compete with the town centre in the early period of the PSP establishing.

## 17 Hawthorn Developments

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Hawthorn Developments controls the town centre.

There is agreement between the VPA and Hawthorn that the town centre can be reduced in size. Hawthorn has expressed a view about the proposed VPA LTC size being capable of further reduction but does not appear to press the issue.

The VPA considers that the town centre size is appropriate and it is generally consistent with the advice received by both parties. Furthermore, if during the life of the PSP, it is demonstrated that the town centre does not need all of the identified land then the Commercial Zone is a flexible zone in terms of the delivery of residential uses or a combination of residential and non-residential uses.

Careful planning therefore dictates the position of the VPA with its marginally larger local town centre should be maintained.

The VPA has previously agreed to moving the location of the town centre north to the cadastral boundary.

At Appendix B, the VPA has provided details of various raised crossings across Melbourne that give priority to bicycle and pedestrian movement. The VPA considered that its drafting was clear i.e. raised pavement treatment and considers that it is a generally standard nature of treatment that could be utilised in these circumstances.

The VPA considers dot point 4 of Requirement 7 may be too prescriptive and agrees to making this requirement more flexible. Alternative wording has been proposed in Part C – Schedule of Proposed PSP Wording Changes.

Hawthorn Developments seeks the ability to vary the Tree Protection Zone (TPZ) for retained trees by adding the words 'unless otherwise agreed by the responsible authority' in circumstances where the presumptive position is protection of the entire TPZ. The purpose of this is to permit consideration of encroachment in accordance with the relevant Australian Standard this being an encroachment of 10%. The Committee may recall that the VPA asked Mr Galbraith about this early in the hearing and he agreed that the Australian Standard provided appropriate guidance for intrusions into the TPZ of trees.

Accordingly it is an issue where flexibility to permit such a change is appropriate.

## 18 Frances and Norman Baker

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The submission by Norman & Frances Baker concerns issues of equity in relation to what the submission terms "public assets" fragmenting the relevant land.

Firstly, it is observed that the Baker submission suggests that it is inappropriate for the PSP to be adopted before, in effect, all drainage land matters are resolved. This is the only submission of this type that the Panel has received in respect of drainage. Even those parties such as the Deague Group who have raised drainage concerns, agree (both with their drainage engineer and their experienced town planner) that notations in the PSP are sufficient to accommodate future flexibility in respect of DSS changes. With respect, it is not a submission that should be adopted by this Committee when the delivery of waterways and in the context of PSPs now follows a well-established path.

The second issue concerns the constraints of the land. The precinct features plan (Plan 2) identifies that there is an existing watercourse on the land. This is a constraint. Approximately 45% of the total of 8.23 Ha is developable. While in its current form the waterway may be degraded it forms part of the proposed DSS.

Under the DSS there will be a development rate paid for what would otherwise be developable land but which is required for the construction of non-natural assets. The VPA understands that this means approximately 1.4 Ha (to be confirmed) of the land outside the waterway will be funded through the DSS (based on the proposed DSS) as will construction of the asset itself.

The Baker land is not proposed to be compulsorily acquired. There is always an opportunity for a party not to develop in accordance with the PSP. The PSP serves to establish how the land (to a level of general accordance) will be developed if the controlling party determines to develop the land. It does not mandate any action. The land will not be compulsorily acquired under any control imposed through this PSP.

Finally, and by way of comment in relation to a question from the Committee after the Baker submission, it should be noted that not all open space is subject to equalisation. Active open space and passive open space are subject to equalisation but service open space (which includes drainage land) is not. Therefore, while there would be payments under the drainage services scheme for elements of the work outside of the natural waterway, there would be no land equalisation under the ICP scheme.

## 19 Universal Syrian Orthodox Church

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The Universal Syrian Church raises three issues.

The location of the north-south connector is agreed by the VPA. The second issue concerns densities within the walkable catchment and the form of the walkable catchment. As outlined elsewhere in this submission the VPA has considered the form of the walkable catchment and proposes some changes to the walkable catchment in the south east area which will impact this site though not to the extent suggested by Mr Fetterplace. The issue of densities is dealt with elsewhere in the submission and these matters are adopted here again.

The submitter seeks that the existing church on the site be assisted by the amendment of guidelines that would recognise any future extension or development of the existing facility in section 3.6.1 and section 4.3. The VPA does not consider it appropriate to include in design objectives for what is to be in the town centre, advice on what can be outside the town centre.

The VPA however acknowledges these existing uses and agrees to the following text at G63:

Educational, community or civic infrastructure not shown on Plan 11 should be located within or proximate to a town centre, local convenience centre, community hub, or council community building or existing Place of Worship as appropriate.'

## 20 Merri Creek Management

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The VPA thanks the MCMC for its continuing interest in the development of PSPs through the Northern Growth Corridor. The VPA observes that the transition from farmland to urban development has been recognised by recent panels as a once in a generational opportunity for investment in degraded waterways. The 'ribbon of magic' that MCMC spoke to will be improved through the urbanisation of this area.

## 21 Aitken College, Greenvale Residents Group, Janet Remington

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A number of submissions are made by parties in relation to the traffic conditions in and around the PSP area, namely by Aitken College, the Greenvale Residents Group and to some extent Ms Remington.

To the extent that it is asserted that the basis upon which traffic has been determined within this PSP is inadequate, the VPA relies on Mr Hill's evidence and the weight of evidence from other traffic witnesses who agree that the PSP can and should proceed.

That is not to dismiss the issues that face growth areas, including this growth area, as internal traffic infrastructure is delivered to development and the external road system facilitated by State funding.

PSPs are planned on the basis of the ultimate development outcome, not the interim, and this is an important element to remember when contextualising the legitimate submissions that are made by these parties.

## 22 Conclusion

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The VPA commends the CWPSP to the Committee and thanks the submitters, parties and the Committee for their investment in the process.

A recommendation is sought that the draft amendment be adopted and approved in the consultation form of the documents, as amended by the Part A changes and updated to include the changes attached to this Part C submission.

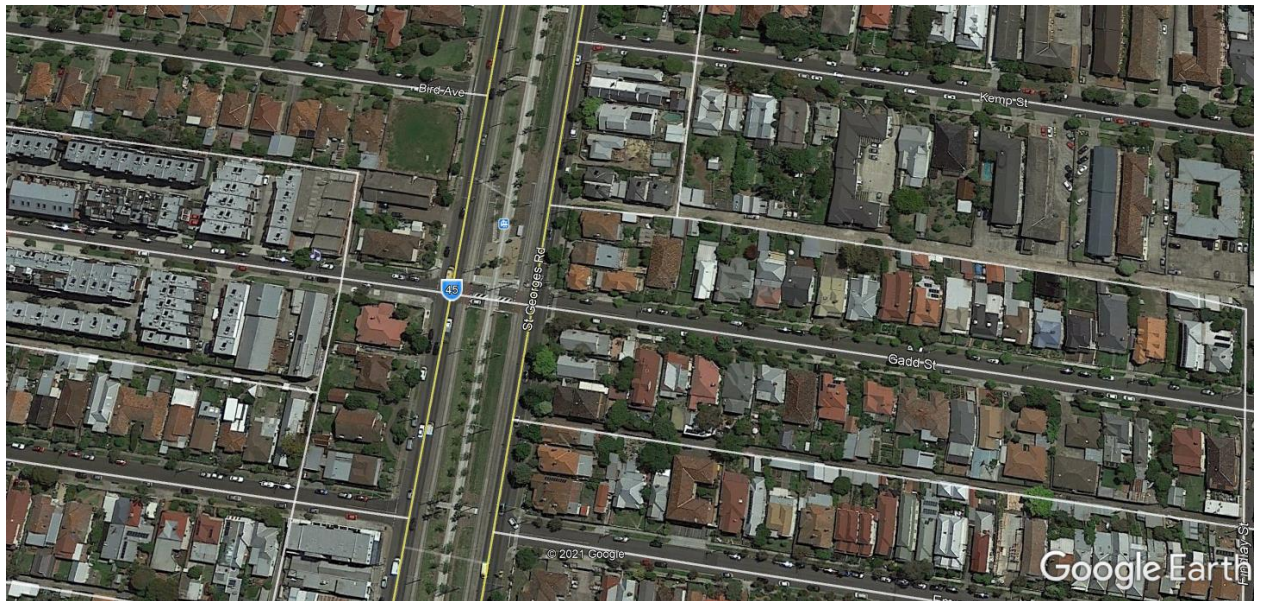
## Appendix A, 1.5km circles of school sites





## Appendix B – Pedestrian Priority crossings

### St Georges Road, Northcote





Park Street, Brunswick

