

Our Reference 322039
Your Reference Shepparton South East Precinct Structure Plan

15 April 2024

Gareth Hatley
Strategic Planning Manager
Victorian Planning Authority

Via email to: sheppartonsoutheast@vpa.vic.gov.au

Dear Gareth

**Submission to the Draft Shepparton South East Precinct Structure Plan & Draft Greater Shepparton Planning Scheme Amendment C117
630 Doyles Road, Shepparton (Property 83)**

Spiire is acting behalf of Bala Doyles Rd Unit Trust, in relation to land at 630 Doyles Road, Shepparton.

The Victorian State Government has committed to addressing the lack of housing supply and housing affordability issues currently impacting Victoria. This Shepparton South East Precinct Structure Plan (PSP) provides an excellent opportunity to increase land supply and provide affordable housing. It is therefore important the final PSP is refined to ensure this can occur.

This is a submission to the draft Shepparton South East Structure Plan and draft Greater Shepparton Planning Scheme Amendment C117 which is on public exhibition until the 15 April 2024.

1. SUBMISISON OVERVIEW

Table 1: Submission Details

Amendment	Amendment C117 – Shepparton South East PSP
Submitter	Spiire on behalf of Bala Doyles Rd Unit Trust
Property Address	630 Doyles Road, Shepparton
Title Details	Lot 1 on PS902314
PSP Property Number	Property 83
Submitter Contact	Casey Collins and Jane Macey – Spiire

The detailed submissions are set out in the following section of this letter. In summary, this submission seeks:

- ▶ Remove the application of the Heritage Overlay from the site.
- ▶ Clarification of why compensation is only proposed for a small portion of the land to be acquired and how the compensation rate was calculated. Object to the proposed compensation rate.
- ▶ Review of the extent of undevelopable land to maximise land available for development.

- ▶ On Property 83 identify the existing area of buildings for residential development.
- ▶ Request further consideration be given to affordable housing through increasing developable land, waiving/reducing development contribution costs and reduce the standard of infrastructure being provided in the Precinct.
- ▶ Reduction to the development contribution rates as these are not competitive against other regional locations.
- ▶ Review of all proposed documentation including the proposed Urban Growth Zone Schedule.
- ▶ Flexibility in the proposed staging of development in the Precinct.

2. SUBJECT LAND

The subject land is located 630 Doyles Road, Shepparton and formally identified as Lot 1 on PS902314. The land comprises 16.87 hectares and contains an existing dwelling and shedding. Vehicle access is via Doyles Road. With the exception of number of trees around the dwelling and along the southern boundary the site is relatively clear of vegetation.

The property overlooks the Broken River and associated bushland to the south and west. 650 Doyles Road (rural lifestyle property) occupies the land to the immediate south. To the immediate south east is 640 Doyles Road which contains JDK Management (coolstore facility). To the immediate north is 600 Doyles Road, farming land with a dwelling.

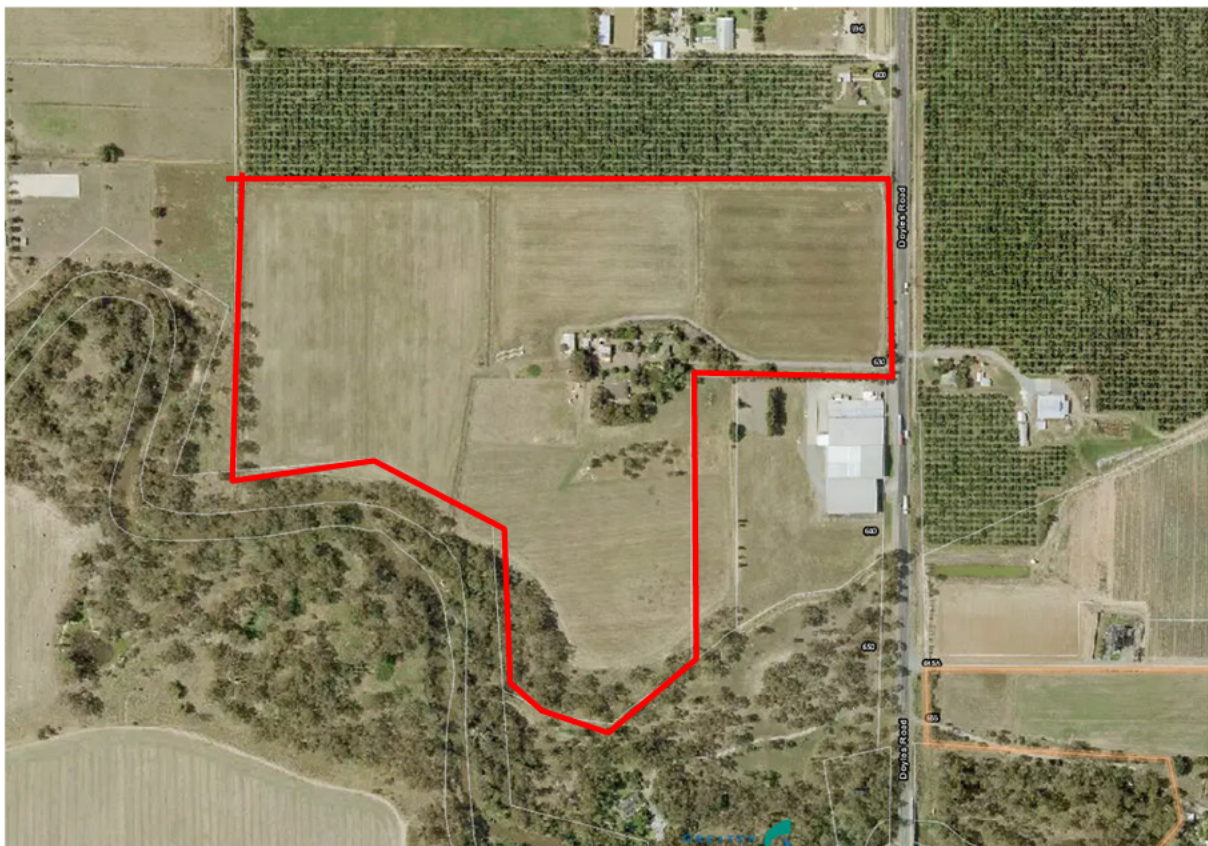


Figure 1: Site Locality Plan (Aerial)

3. GREATER SHEPPARTON PLANNING SCHEME

Pursuant to the Greater Shepparton Planning Scheme the land is within the Farming Zone - Schedule 1 and partly within the Urban Floodway Zone along the southern boundary, refer to Figure 2. The land is also adjacent to a road in the Transport Zone 2 (Doyles Road).



Figure 2: Zone Plan

The land is also partly within the Bushfire Management Overlay, Floodway Overlay, the Land Subject to Inundation Overlay and the Specific Controls Overlay – Schedule 3.

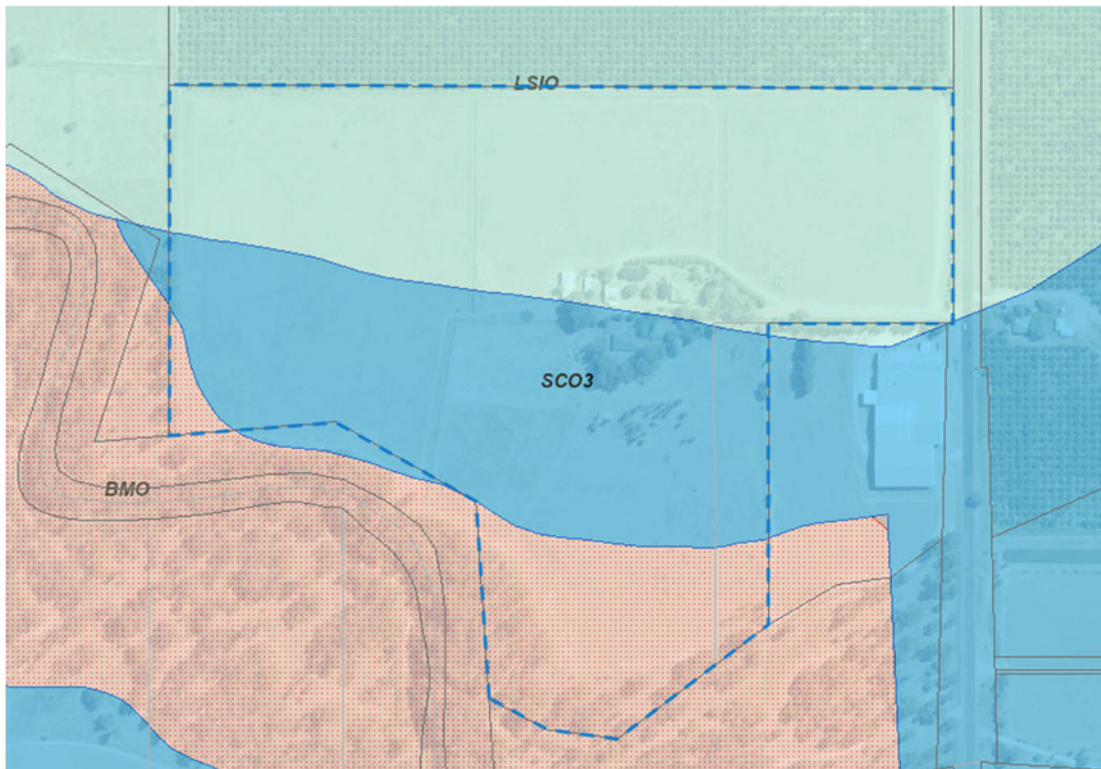


Figure 3: Overlays Plan

4. DRAFT SHEPPARTON SOUTH EAST PRECINCT STRUCTURE PLAN & AMENDMENT C117

4.1 DRAFT SHEPPARTON SOUTH EAST PRECINCT STRUCTURE PLAN

The subject site lies within the boundary of the draft Shepparton South East Precinct Structure Plan (PSP) and has been identified as Property 83.

Plan 3 (refer to Figure 4) in the draft PSP has identified the land as:

- ▶ residential in the north east corner of the site
- ▶ existing urban areas/developed land over the existing dwelling central to the site
- ▶ local open space
- ▶ Broken River floodplain
- ▶ Local access along the southern boundary of the residential land and along the Doyles Road frontage.

Plan 5 Character, Heritage and Housing identifies the site as a *'place of local heritage significance'*.

Plan 10 Public Transport and Pathways *'off-road shared path'* through the subject property

Plan 11 Interface Impact Areas identifies part of the site within the noise impact area for JDK Cold Storage and noise impact area for Doyles Road (20m-70m).

Plan 13 Infrastructure & Development Staging identifies the site for long (15+ years).

The Land Valuation Assessment – March 2023 indicates 0.38ha with a compensation \$114,213.

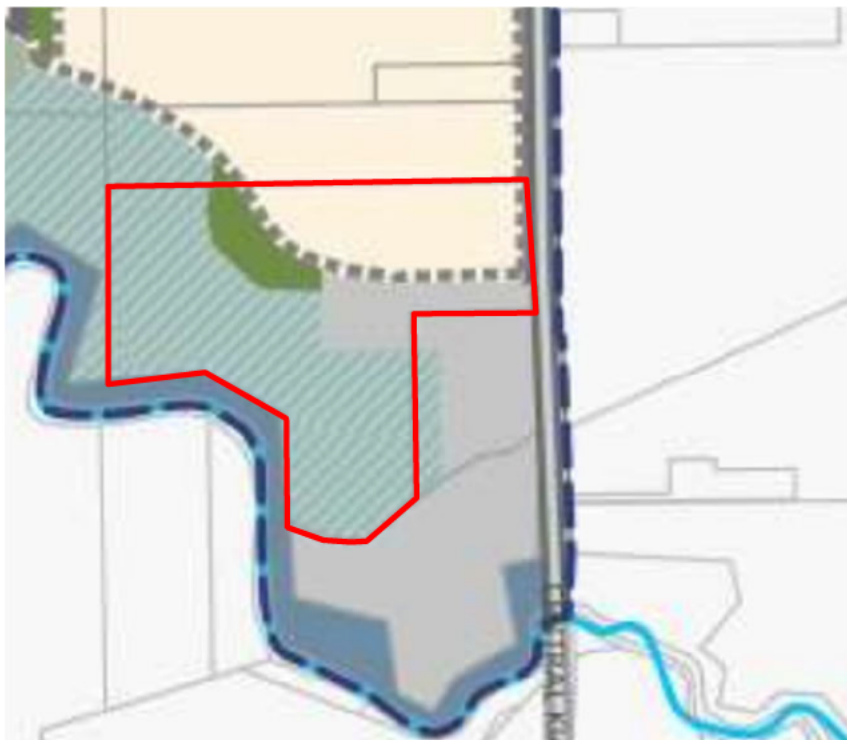


Figure 4: Extract from the Draft Precinct Structure Plan



Figure 5: Extract of Public Transport & Pathways

4.2 DRAFT GREATER SHEPPARTON PLANNING SCHEME AMENDMENT C117

The draft Amendment Documentation for Greater Shepparton Planning Scheme Amendment C117 proposes to make the following changes to the subject site:

- ▶ Rezone the land identified for residential to the Urban Growth Zone – Schedule 2 (the applied zone - General Residential Zone), for existing developed land to Farming Zone and for the Broken River floodplain land to the Urban Floodway Zone.
- ▶ Apply the Development Contributions Plan Overlay – Schedule 5
- ▶ Apply the Environmental Audit Overlay to part of the land
- ▶ Apply a Public Acquisition Overlay 39 (PAO39) to a large portion of the subject site, in favour of the Greater Shepparton City Council for the purpose of a Stormwater Infrastructure.
- ▶ Remove the Land Subject to Inundation Overlay
- ▶ Apply the Floodway Overlay and Land Subject to Inundation Overlay
- ▶ Apply the Heritage 442 to the existing dwelling

5. SUBMISSION

Upon review of the draft PSP and the Amendment documentation, our client seeks clarification on a number of matters, and requests the following be considered before the PSP and Amendment are approved.

5.1 Heritage Overlay

The Statement of Significance provided does not adequately substantiate why the house on the property is of a significance to warrant the Heritage Overlay being applied. The Statement has not confirmed the house was built by Coe which appears to be an important aspect. Our client submits the house is not in a condition to be retained, and objects to the application of the Heritage Overlay. Our client is currently seeking independent heritage advice in relation to this matter.

5.2 Public Acquisition Overlay

The Public Acquisition Overlay appears to cover approximately 10 hectares of the property. Based on the Land Valuation Assessment, compensation is only proposed to be provided for 0.38 hectares. Our client seeks clarification why compensation is only proposed for this significantly smaller area.

The compensation rate is \$300,000/hectare for the site. It is unclear from the Land Valuation Assessment how this rate was calculated. Our client seeks further details and objects to current rate.

5.3 Extent of Net Developable Land in the Precinct

The PSP area comprises 385 hectares, of which 250 hectares (65%) is identified as developable land. Whilst land does need to be set aside for infrastructure, recreational and community facilities to service the Precinct, the provision of land for open space (21.5% of the Precinct) and community facilities appears to be excessive. This impacts the net developable land available, which in turn increases the per hectare rate of development costs.

The extent of undevelopable land should be reviewed.

5.4 Extent of Net Developable Land on Property 83

Our client has no objection to the removal of the existing buildings on Property 83 to increase developable land. It is requested the area set aside as existing urban area be identified for residential.

5.5 Housing Affordability

As VPA and Council are aware the provision of land supply and housing affordability across Victoria is a significant issue. If all levels of Government are committed to improving housing affordability, all levels of Government should assist with funding the development of this Precinct and/or explore ways to assist developers to provide residential land in an affordable way.

The proposed PSP is to provide approximately 2,500 dwellings, which forms a crucial component of the dwellings to meet State Government housing target. Given this, the State Government/VPA and Council should look to waive costs such as the Strategy Planning costs (included in the Development Contributions Plan – see Figure 7 over the page), and also significantly fund the upgrade of intersections along Doyles Road. Doyles Road is a National and State freight route, and already carries significant traffic, with these intersections currently experiencing regular incidents or near misses. It should not be the responsibility of residential land providers to fully fund the upgrades and improvements this freight route requires.

The community facilities proposed to be provided in the PSP appear to be excessive, and it is considered the background assessments do not adequately substantiate such infrastructure for this Precinct. It is unclear why the Precinct would fully fund the construction of a multi-purpose children's centre (estimated cost over \$10million) when this facility will also be utilised by those living in the established residential neighbourhoods of Shepparton. It is submitted the scale of these items be

reviewed; Government contributions be included on behalf of the established residential areas which will likely use and benefit from the infrastructure; and joint ventures explored with the private sector to fund/provide these facilities.

5.6 Development Contributions

The proposed Development Contributions for land within the PSP is \$411,223/hectare, which comprises levies per facility as shown in Figure 6 below.

Facility	Levies payable by the development	
	Development Infrastructure	Community infrastructure
	All development per net developable hectare	Residential per dwelling
Transport	\$91,574	\$0
Community facility	\$110,852	\$0
Drainage	\$160,256	\$0
Strategic planning	\$9,960	\$0
Early developer works	\$38,580	\$0
TOTAL	\$411,223	\$0

Figure 6: Extract from Development Contributions Plan Overlay Schedule 5 (Amendment C117gshe)

Based on the density of development referenced in the PSP of 10 dwellings per hectare, this equates to a levy of \$41,122/lot. The following table provides a comparison between other regional PSP recently approved:

Table 2: Comparison of similar regional DCP rates/hectare

Municipality	PSP Area	Development Contributions/hectare
Campaspe	Echuca West	\$149,509
Greater Bendigo	Huntly	\$95,381
Ballarat	Ballarat West	\$147,753.24
Greater Shepparton	Shepparton North East	\$146,793
Bass Coast	Wonthaggi North East	\$258,421
Greater Shepparton	Shepparton South East	\$411,223

The proposed development contributions for this PSP are significantly higher than many other regional PSP areas which will have direct implications on the feasibility of developing this Precinct, let alone on the provision of affordable housing.

A thorough review of the development costs needs to be undertaken, including for these levies:

- ▶ Transport cost apportionment needs to be equitable. For example, the cost for the Doyles Road/Channel Road roundabout and the Doyles Road/Poplar Avenue intersection upgrades should be apportioned between all beneficiaries, including National and State Governments. As identified in Table 4.3 of the Transport Impact Assessment (Stantec, 13 September 2023) the ultimate traffic volumes at Doyles Road/Channel Road intersection (2031) will equate to 68%, yet the Precinct is nominated to fund 100% of these upgrades.
- ▶ Transport costs could also be reduced through the removal of pedestrian crossings along Doyles Road. Doyles Road is a significant freight route which needs to be protected. The 2050 Growth Plan restricts/limits residential development of land on the eastern side of Doyles Road, therefore pedestrian crossings are considered unnecessary. These are also likely to pose a safety risk.
- ▶ Extent of recreational and community facilities provided in the Precinct, refer to Section 5.5 above.
- ▶ Extent of undevelopable land provided in the Precinct, refer to Section 5.3 above.
- ▶ Waive the 'early developer works' fees.
- ▶ Review proposed cross sections.

5.7 Review Amendment Documentation

A thorough review of all amendment documentation should be undertaken, in particular the proposed Schedule 2 to the Urban Growth Zone. The following should be considered (but not limited to):

- ▶ Section 2.4 requires the interim construction Doyles Road intersections to occur when planning approval is granted for more than 800 residential lots in the Precinct. This is likely to be a significant deterrent to developers.
- ▶ Section 2.5 & Section 3 requires a sodic and/or dispersive report/management plans be prepared. The Land Capability Assessment prepared by SMEC recommended "*sodic soil risk be documented within a Construction Environmental Management Plan (CEMP) which lists the required controls to manage sodic soils.*" It is considered this a more appropriate approach.
- ▶ Section 3 – refers to incorrect AS3959, should be 2018, not 2009.
- ▶ Section 3 – landowners/developers should not be responsible for the construction or costs of construction of pedestrian/shared pathways not located on or along the frontage of their land.

5.8 Staging

The Property 83 has been identified to for long term growth. It is submitted timeframes for development must remain flexible to respond to market demand and the ability to provide multiple housing fronts and choice.

As detailed above, this submission seeks:

- ▶ Removal of the Heritage Overlay from the site.
- ▶ Clarification of why compensation is only proposed for a small portion of the land to be acquired and how the compensation rate was calculated. Object to the proposed compensation rate.
- ▶ Review of the extent of undevelopable land to maximise land available for development.

- ▶ On Property 83 identify the existing area of buildings for residential development.
- ▶ Further consideration to affordable housing through increasing developable land, waiving/reducing development contribution costs and reduce the standard of infrastructure being provided in the Precinct.
- ▶ Reduction to the development contribution rates as these are not competitive against other regional locations.
- ▶ Review of all proposed documentation including the proposed Urban Growth Zone Schedule.
- ▶ Flexibility in the proposed staging of development in the Precinct.

We welcome opportunity to discuss our submission further with the VPA and Council. With any queries or to arrange a meeting time, please contact me on [REDACTED] or Casey Collins on [REDACTED]
[REDACTED]

Yours sincerely

[REDACTED]
Jane Macey
Principal Planning