



# A Different City

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**Craigieburn West PSP**

**Expert Evidence**

**Jonathon Fetterplace**

**Prepared for:**

**SFA Land Developments Pty Ltd**



# A Different City

**This report has been prepared by:**

Jonathon Fetterplace  
Director  
A Different City Pty Ltd

Date: 19 April 2021

**This report has been requested by Russell Kennedy on behalf of SFA Land Developments Pty Ltd and accordingly is subject to legal professional privilege.**

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## Introduction

1. My name is Jonathon Cobbley Fetterplace and I am a Director of A Different City Pty Ltd which conducts its business at Level 2, 52 Albert Road, South Melbourne. My qualifications and experience are described in Appendix 1.
2. I have been requested by Russell Kennedy on behalf of the SFA Land Developments Pty Ltd (SFA), who own the land at 1600 Mickleham Road, Mickleham (the Subject Site), to prepare an expert report considering the planning matters relevant to the Subject Site, the Craigieburn West Precinct Structure Plan (CWSP) and draft Hume Planning Scheme Amendment (known as Referral No. 4 under the Victorian Planning Authority (VPA) Fast Track Program).
3. Specifically, I have been requested to review and consider the exhibited Amendment documentation and SFA's submission to the VPA and provide my opinion (including recommendations) as to whether the Amendment is appropriate having regard to:
  - the SFA submission;
  - the matters raised by the draft PSP (dated November 2020);
  - any regulatory framework applicable to the proposal, which is within my expertise to examine and comment on, having regard to the strategic planning background giving rise to the Amendment with consideration of relevant planning controls including strategies and policies in the Hume Planning Scheme;
  - my own judgement and experience; and
  - any other matter which I regard as relevant to the formulation of my opinion.
4. The Amendment applies to approximately 562 hectares of land and is bound to the north by Mt Ridley Road, to the east by Craigieburn R2 PSP area, to the south by Greenvale North R1 PSP area and to the west by Mickleham Road (the PSP Area).
5. The Amendment proposes, amongst other things, to incorporate the draft CWSP into the Hume Planning Scheme and to rezone the Subject Site to the Urban Growth Zone Schedule 12 to facilitate the urban development of the land.
6. In undertaking my assessment, I have inspected the Subject Site and surrounds and have considered various documents relating to the Amendment and the CWSP.
7. I have also reviewed the submission made by SFA and submissions made by other parties to the exhibition of the Amendment. I have also reviewed the relevant provisions of the Hume Planning Scheme and a number of relevant policy documents. I provide a list of the relevant policy documents that I have had regard to at Appendix 2 of my report.
8. A summary of my opinion with respect to my instructions and issue arising from my assessment is as follows:
  - The 'walkable catchment' of the proposed Local Town Centre (LTC) does not to take into consideration the existing physical attributes, planned land uses, amenities and the overall urban structure of the PSP which should be considered when defining the appropriate boundaries for where greater densities should be directed.
  - A 'local context based' approach to the definition of the boundaries of the 'walkable catchment' of the proposed LTC should be applied to re-align the catchment area in a north-south linear shape to include the planned amenities north and south of the LTC; support the planned future public transport network; and provide a transition of density and housing form in response to the sensitive interface of the Mickleham Road inter-urban break.



- An average density target of 26.5 dwellings per NDHa is excessive taking into consideration the contextual factors of the PSP and the targets applied in other similar PSP areas. A density ranging between 22 to 25 dwellings per NDHa is more appropriate to be applied within the 'walkable catchment' of the proposed LTC.
  - An average density of between 17 to 18 dwellings per NDHa is appropriate be applied to areas outside the walkable catchment of the LTC, having regard to similar other PSP areas and to appropriately increase densities in growth areas incrementally overtime.
  - Requirement R5 and the application requirements of Schedule 12 should be deleted, and guideline G4 of the CW PSP should be amended to delete the proposed percentage target, in the absence of a local area study identifying a specific target requirement.
  - Table 7 and Appendix 4.3 should include additional guidance to acknowledge and address the potential amenity conflicts that may arise from the design and layout of the LTC with the surrounding residential area.
9. I declare that I have made all the inquiries that I believe are desirable and appropriate. No matters of significance that I regard as relevant have, to my knowledge, been withheld.



## The Subject Site

10. The Subject Site is identified as Certificate of Title Volume 08210 Folio 292. Lot 1 on Plan of Subdivision 039373, Parent Title Volume 04318 Folio 559.
11. The Subject Site is generally rectangular in shape and comprises a total area of approximately 11.2 hectares. The land has the following approximate dimensions 400m north; 310m east; 320m south; and 320m west. Refer Figure 1 below.

Figure 1 – Aerial photograph of the Subject Site below. Source: Nearmap

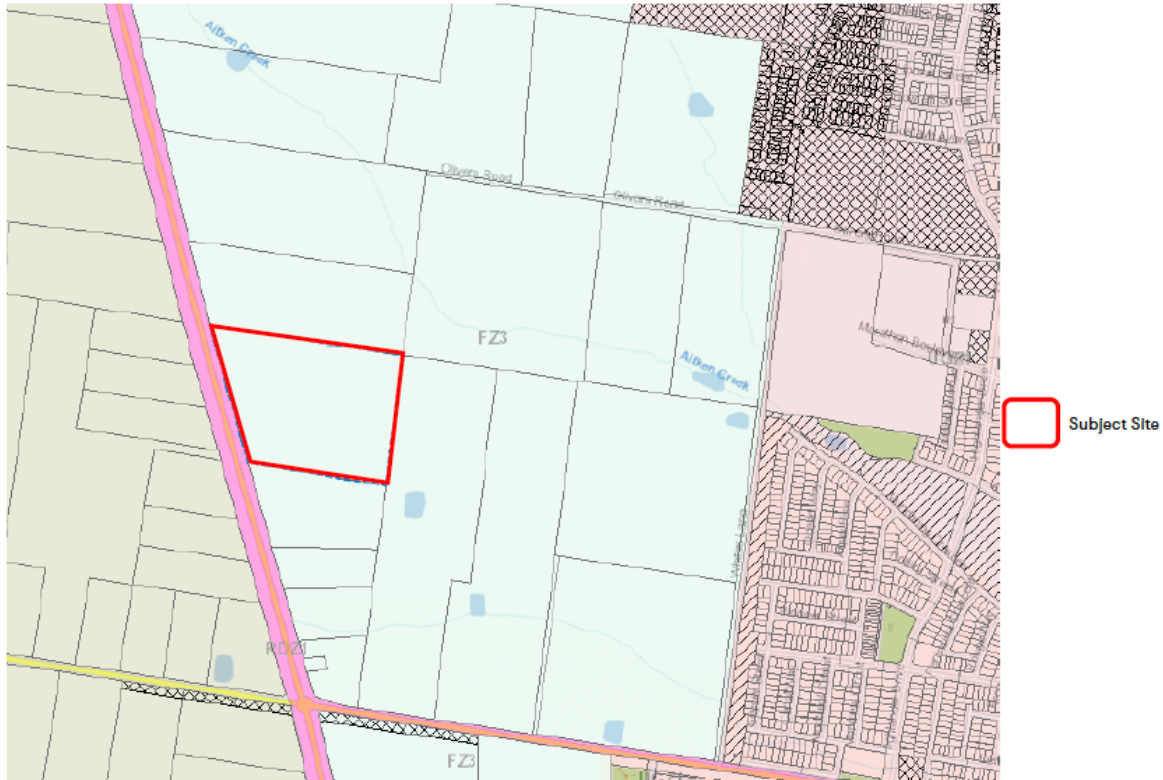


12. The land is generally flat and cleared for farming purposes, containing grassed pasture and limited other vegetation. Canopy trees are located along the fence line of the eastern boundary of the Subject Site and a small dam is located centrally within the site. The dam is flanked by a row of small trees/shrubs. No buildings are located on the Subject Site at present.
13. The Subject Site is accessed via the Mickleham Road reservation, however no formal or direct accessway is identified along the frontage. A farm gate is located approximately at the mid-point of the western fence line of the Subject Site.
14. The Mickleham Road reservation adjoining the frontage of the Subject Site contains a row of large canopy trees, power poles / electricity cables and road safety barriers that extend along the entire site frontage. Road safety barriers adjoin the eastern edge road pavement for the length of the Subject Site, with a break located approximately at the mid-point along the frontage, providing vehicle access to the farm gate.
15. The Subject Site is zoned Farming Zone (Schedule 3). No overlays apply to the Subject Site.
16. The Subject Site has frontage to Mickleham Road (to the west), which is subject to a Road Zone (Category1). Refer Figure 2 below.

Figure 2 – Zone plan of the Subject Site below. Source: Vic Plan

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## The Surrounding Land

17. The Subject Site is located to the western edge of the existing urban area of Craigieburn. Mickleham Road forms the Urban Growth Boundary which separates the designated 'urban area' east and the inter-urban break / Greenwedge rural land to the west.
18. Mickleham Road is a two-way arterial road that carries large volumes of traffic north-south through Greenvale to the Tullamarine Freeway (south) and north to Mickleham and Beveridge.
19. The existing urban area to the east appears generally flat and is subject to recent and ongoing urban development associated with the Craigieburn R2 PSP (approved in 2010). While many of the land holdings in this area have been subject to urban development, there are a number of properties that remain undeveloped or still used for farming, agricultural and rural residential purposes at present.
20. The existing Greenwedge land to the west of the Subject Site (western side of Mickleham Road) also appears to be used for farming, agricultural and rural residential purposes.
21. The land immediately surrounding the Subject Site is similar in character, typography and land use to the Subject Site itself. However, topography of the land on the western side of Mickleham Road in proximity of the subject site appears more undulating (than the east side of the road) and the presence of large canopy trees forms a strong part of the landscape character in this location. Refer Figure 3 below.





Figure 3 – Aerial photograph of the Surrounding Context. Source: Nearmap



22. The land immediately abuts 1630 Mickleham Road to the north (Property 13 within the CWPSP); 700 Craigieburn Road to the east (Property 23 within the CWPSP); and 1570 Mickleham Road to the south (Property 18 within the CWPSP). Each of these properties appears to be used for existing agricultural purposes. Property 18 and 23 contain existing residential dwellings and associated agricultural buildings and sheds.
23. The property at 1630 Mickleham Road is subject to a dry tributary, known as Aitken Creek, that traverses the north eastern part of the land holding and dissects the PSP area. It forms part of the wider Craigieburn East drainage reserve (refer Plan 2, Precinct Features, CWPSP, November 2020).
24. The Subject Site is located in proximity to the surrounding other features:
  - Craigieburn Central Shopping Centre is located approximately 3km to 3.5kms to the south-east. Craigieburn Central forms part of the Craigieburn Principal Activity Centre containing major shopping, entertainment, dining, community, medical, other commercial services;
  - The wider area surrounding Craigieburn Central also contains community and health services, as well as recreational and sporting facilities such as the Craigieburn Aquatic Centre (3kms east) and the Hume Tennis & Community Centre (1.5kms east);
  - Aston Village LTC, School and Sports fields are located 1.3kms south (located within the Craigieburn R2 PSP area); and
  - Mickleham Primary School is located 2.3kms north.
25. There are limited existing public transport options that service the Subject Site. Craigieburn Train Station is located 6kms to 7kms to the east of the Subject Site. There are existing bus services that provide connection to Craigieburn Train Station, however the closest existing bus stops are approximately 2.5kms from the Subject Site.

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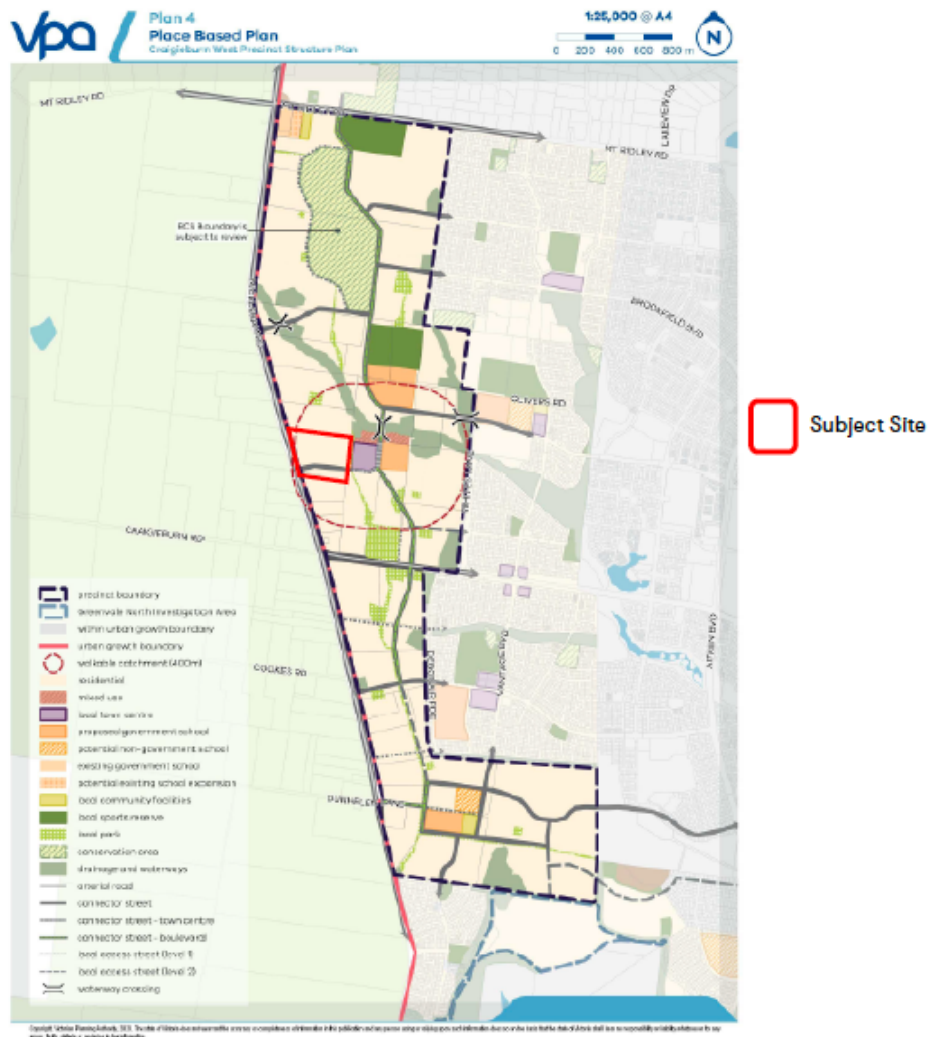
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## Craigieburn West Precinct Structure Plan (Nov 2020)

26. The Craigieburn West Precinct Structure Plan (CWSP) applies to 562 hectares of land, including the Subject Site, approximately 30kms north of the Melbourne CBD.
27. The PSP area is generally bounded by Mt Ridley Road to the north, the Craigieburn R2 PSP area to the east, the Greenvale North R1 PSP to the south and Mickleham Road to the west. The CWSP sets the long term vision and guidance for the future development of the subject land.
28. Plan 3 (p. 12) of the CWSP identifies properties subject to the PSP area. The Subject Site is identified on this Plan as Property number 17.
29. The Place Based Plan (Plan 4, p.14 of the PSP) provides the future urban structure for the PSP area. The Plan identifies land uses, key infrastructure items and environmental features to deliver urban development within the precinct. An extract of the Place Based Plan is provided below in Figure 4.

Figure 4 - Extract from Plan 4 – Place Based Plan (CWSP, November 2020)



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30. Features of the Place Based Plan, as it relates to the Subject Site, includes:

- The majority of the property to be developed for residential purposes;
- The land is identified as being almost wholly located within the 'walkable catchment' of future Local Town Centre (LTC);
- A connector street is proposed to traverse the site providing direct access from Mickleham Road (via a future signalised intersection - refer Plan 5: Transport Plan) to the LTC east;

31. Other notable features of the Place Based Plan as it relates to the immediate context of the Subject Site, includes:

- A Local Town Centre (LTC) to be located east of the Subject Site (within property 23 of the PSP area). The LTC is proposed to be developed for 6,000sqm of retail floor space and 1000sqm of commercial floor space (per Table 6: Craigieburn West town centre hierarchy). The LTC is to provide a full line supermarket, speciality shops, with the ability to support non-retail services;
- A proposed Government School is located adjoining the LTC to the east of the Subject Site (within property 24 of the PSP area);
- A 'mixed use' area is located north of the LTC in close proximity to the Subject Site (within property 23 and 14 of the PSP area). Based on the provisions of Table 7: Craigieburn West Local Town Centre – Performance requirements & guidelines the mixed use precinct is to provide 'retail and/or office at ground level, and office, commercial and residential above ground level';
- A Green Link (Linear Park - GL-04) is proposed to be located adjacent to the eastern boundary of the Subject Site (within property 23 of the PSP area). As per Table 5: Credited open space delivery guide, the park will be 1.40ha in area and is 'located to retain existing vegetation in a passive open space and link the linear park network from the Aitken Creek shared path network to the Local town centre and LP-09'; and
- Encumbered open space is located north east of the Subject Site (within property 23 of the PSP area). This open space will provide water retardation off-line from the Aitken Creek reserve (ACSB07 – Refer Plan 6: Integrated Water Management Plan).

32. The PSP establishes eight (8) objectives to implement the vision and desired outcomes for the Precinct's development. These are:

1. Housing, subdivision & built form;
2. Transport & movement;
3. Public realm, open space & heritage;
4. Water, utilities & safety;
5. Biodiversity & ecosystems;
6. Education & community infrastructure;
7. Centres, employment & economic activity; and
8. Precinct infrastructure delivery;



33. Each objective includes requirements and guidelines which will guide the implementation and delivery and articulates where outcomes are mandatory and where discretion may be exercised.

34. Of particular relevance to the Subject Site and this evidence statement, requirements and guidelines, include the following:

35. Section 3.1 (Housing, subdivision & built form):

- **R1:** Subdivision layouts, lot diversity and housing typologies must respond to the natural and existing built features of the surrounding developed area, including (but not limited to):
  - Topographical features;
  - Aitken Creek and Yuroke Creek tributaries; and
  - Rural landscape interface west of old Mickleham Road.
- **R2:** Subdivision must provide a diverse neighbourhood character by providing a range of lot sizes and dwelling types in appropriate locations throughout the Precinct, including achieving minimum average densities and planned neighbourhood character as specified in Plan 4 and Table 2.

Table 2 (Housing density guide and planned neighbourhood character) provides details of planned character outcomes and minimum average density targets as they relate to residential development within and outside the 'walkable catchment' that applies the proposed LTC, including the Subject Site. Refer below Figure 5 - Table 2 of the CWPSP.

Figure 5 - Table 2: Housing density guide and planned neighbourhood character [CWPSP, November 2020]

Table 2: Housing density guide and planned neighbourhood character

DEVELOPMENT AREA	PLANNED NEIGHBOURHOOD CHARACTER	MINIMUM AVERAGE DENSITY (DW/NDHA)
Standard residential outside walkable catchment	Development will have a traditional suburban neighbourhood character characterised by buildings up to three storeys in height. Housing will generally comprise detached and semi-detached typologies. However, more intensive forms of development such as terraced homes and townhouses should be provided in proximity to areas of high amenity, or where it can be demonstrated that a positive contribution will be made to neighbourhood character and identity.	18.5
Residential within walkable catchment	Development will have an urban neighbourhood character, characterised by buildings up to four storeys in height. Housing will comprise a variety of typologies, including low-rise apartments buildings, terraced homes and townhouses (including rear-loaded product), and detached dwellings.	26.5

- **R4:** Development along Mickleham Road and Mt Ridley Road must provide a sensitive rural interface through design treatments, which include a landscaped nature strip between the row of housing and road reservation.
- **R5:** An application for subdivision of land into residential lots or development of land for residential or mixed use purposes must provide affordable housing as defined by the Planning & Environment Act 1987 to the satisfaction of the responsible authority.

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- **G4:** Applications for residential subdivision or development should provide an equivalent of up to 10% of the total number of dwellings forecast to be provided (and may be provided as constructed dwellings or land or otherwise). The affordable housing should:
  - be provided within walkable catchments where practicable;
  - provide for a range of housing typologies to meet demonstrated local need; and provide for very low, low, and moderate income households.
- **G5:** Subdivision should deliver a broad mix of lots that are an appropriate size and shape to support the planned neighbourhood character of the precinct, as specified in Table 2, by:
  - Providing a range of lot sizes, widths, depths and densities
  - Providing higher residential densities and more intensive building typologies in locations where they will:
    - Support the viability and vibrancy of activity centres, access to community infrastructure and amenities.
    - Have good access to public transport and support walking and cycling.
    - Make a positive impact to planned neighbourhood character and identity through the incorporation of remnant vegetation (where indicated in Plan 10).

#### 36. Section 3.2 (Transport & movement)

- **R6:** Any road nominated in Plan 5 as a potential public transport route must be constructed (including partial construction where relevant) in accordance with the corresponding cross section in the PSP and the Department of Transport's guidance for public transport and land use development.
- **R8:** Vehicle access to lots fronting arterial roads must be provided from the local internal loop road or rear lane, to the satisfaction of the Road Authority.

#### Section 3.8 (Precinct infrastructure delivery)

- **R37:** Development staging must provide for the timely provision and delivery of:
  - Boulevard connector streets, connector streets, connector street waterway crossings and connector street intersections with arterial roads.
  - ....

#### 37. Within the Appendices, the PSP also provides the following references that apply to the Subject Site and of note in relation to this evidence statement, including:

- The PSP land budget (Section 4.2, P 49) identifies that the Subject Site will contribute 0.12ha of land for arterial road widening associated with the construction of the proposed intersection (IN-04) with Mickleham Road.
- Section 4.3 (p. 51) provides design principles for the proposed LTC. Principle 7 seeks to 'Include a range of medium and high-density housing and other forms of residential uses within and surrounding the local town centre'. More specific guidance is provided in relation to connectivity, amenity, managing land use conflicts and applying the use of the small lot housing code around the town centre.



## Draft Planning Scheme Ordinance

38. A draft Planning Scheme ordinance has been prepared and as part of the proposed Planning Scheme Amendment to implement the CWPSP. The documentation was prepared for public consultation, dated November 2020.
39. Draft Schedule 12 to Clause 37.07 (Urban Growth Zone) to the Hume Planning Scheme (UGZ12). The Schedule implements the CWPSP. Table 1 of Clause 2.2 provides the following applied zone provisions with reference to Plan 1 of the Schedule (Plan 4 - Place Based Plan, CWPSP), including as relevant to the subject site:

<i>Land shown on plan 1 of this schedule Residential on a lot wholly within the local town centre walkable catchment</i>	<i>Applied zone provisions Clause 32.07 Residential Growth Zone</i>
<i>Land shown on map 1 of this schedule All other land</i>	<i>Applied zone provisions Clause 32.08 General Residential Zone</i>

40. Schedule 12 to the UGZ also provides permit controls and application requirements for land use, subdivision and development within the PSP area. Of relevance to this evidence statement, the draft schedule include application requirements and decision guidelines for the provision of affordable housing to demonstrate that the proposal will contribute towards the provision of affordable housing.
41. Draft Schedule 6 to Clause 43.03 (Incorporated Plan Overlay) to the Hume Planning Scheme (IPO6) implements the CWPSP and provides specific conditions and requirements for permits.

## The Strategic Planning Policy Context

42. The CWPSP states (at p. 1) that the preparation of the PSP has been informed by the following strategic planning documents:
- *Plan Melbourne – Metropolitan Planning Strategy, May 2017;*
  - *The Growth Corridor Plans: Managing Melbourne’s Growth (Growth Areas Authority, June 2012);*
  - *The Planning Policy Framework as set out in the Hume Planning Scheme;*
  - *The Local Planning Policy Framework as set out in the Hume Planning Scheme;*
  - *The Biodiversity Conservation Strategy and Sub Regional Species Strategies for Melbourne’s Growth Areas (Department of Environment and Primary Industries, June 2013);*
  - *The Precinct Structure Planning Guidelines.*
43. I have considered the above documents, as relevant, in order to inform my opinion in relation to this evidence statement.
44. I note however, no specific version reference is provided in the PSP in relation to the Precinct Structure Plan Guidelines. Notwithstanding I have considered both the Precinct Structure Plan Guidelines (2009, Revised 2013) and the Guidelines for Precinct Structure Planning in Melbourne’s Greenfields (Draft for Public Engagement – September 2020).

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45. I have also undertaken a review of the relevant strategic planning policy context associated with the proposed Planning Scheme Amendment, including other strategic policy documents. I provide at Appendix 2 of my report a list of the relevant State and Local Planning policy and other relevant adopted policy documentation that that I have reviewed and considered to be relevant to this matter.
46. I provide a summary below of some of the key directions contained within these documents, as relevant, including:

## Plan Melbourne 2017-2050

47. Plan Melbourne identifies that Melbourne will need 1.6million new homes to 2050. Its sets a framework for metropolitan planning policy to be implemented across the city.
48. Outcome 2 relates to the provision of housing choice. Policy states that Metropolitan Melbourne has at least 25years supply of greenfield land available for residential development and that *'new residential suburbs being created in growth areas are to be guided by the Precinct Structure Planning Guidelines'*.
49. Direction 2.1 seeks to *'manage the supply of new housing in the right locations to meet population growth and create a sustainable city'*. This will be done by policy (Policy 2.1.1) that *'maintains a permanent urban growth boundary around Melbourne to create a more consolidated sustainable city'*. Priorities of this policy include to
- *plan and define expected housing needs across Melbourne's regions*
  - *reducing urban sprawl*
  - *increasing metropolitan housing densities in the right places*
  - *ensuring Melbourne's established suburbs accommodate a greater share of Melbourne's growth*
  - *creating a more consolidated city of 20-minute neighbourhoods with good access to public transport and services*
  - *protecting the values of non-urban land, opportunities for productive agricultural land and significant landscapes.*
50. Direction 2.2 aims to *'deliver more housing closer to jobs and public transport'*. Policy 2.2.5 requires development in growth areas to be sequenced and staged to better link infrastructure delivery to land release. The policy states:

*'Melbourne's growth areas have at least 25 years supply of greenfield residential land (undeveloped land on the fringe of the city). Of this, approximately 15 years land supply is 'development ready', being either zoned or having approved Precinct Structure Plans. Residential densities in recent years have increased from 15 dwellings per hectare to around 18 dwellings per hectare. If average densities continue to increase, this supply will last beyond 2050.*

...

*In the future, planning and development of growth areas should:*

- *provide around 15 years supply of land approved for development*
- *over time, seek an overall increase in residential densities to more than 20 dwellings per hectare*
- *be sequenced to ensure new precincts are contiguous with previously approved precincts.'*

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## State Planning Policy Framework of the Hume Planning Scheme

56. The State Planning Policy Framework (SPPF) seeks that the objectives of Section 4 of the *Planning and Environment Act 1987* are implemented through land use and development addressing environmental, social and economic factors in order to achieve sustainable development.
57. **Clause 11 (Settlement)** provides guidance on planning for the needs of existing and future communities. Strategies contained at 11.01-1S (Settlement) include to:
- *Plan for development and investment opportunities along existing and planned transport infrastructure.*
  - *Balancing strategic objectives to achieve improved land use and development outcomes at a regional, catchment and local level.*
  - *Providing for appropriately located supplies of residential, commercial, and industrial land across a region, sufficient to meet community needs in accordance with the relevant regional growth plan.*
  - *Ensure land that may be required for future urban expansion is not compromised.*
58. **Clause 11.02 (Supply of Urban Land)** seeks to 'to ensure a sufficient supply of land is available for residential, commercial, retail, industrial, recreational, institutional and other community uses. Amongst other matters the strategies include to 'ensure that sufficient land is available to meet forecast demand' and to plan to 'accommodate projected growth over at least a 15 year period and provide clear directions as to where growth should occur'.
59. **Clause 11.03-1S (Activity Centres)** aims to encourage concentration of developments into activity centres that are highly accessible to the community. Strategies to build up activity centres through a network of centres of different sizes and functions and providing different types of housing. Other strategies referred include:
- *Support the role and function of each centre in the context of its classification, the policies for housing intensification, and development of the public transport network.*
  - *Encourage a diversity of housing types at higher densities in and around activity centres.*
60. **Clause 11.03-2S (Growth Areas)** provides objectives which states 'to locate urban growth close to transport corridors and services and provide efficient and effective infrastructure to create sustainability benefits ...'
61. The strategies to implement the objectives include to develop growth area framework plans that, amongst other matters, include:
- *Encourage average overall residential densities in the growth areas of a minimum of 15 dwellings per net developable hectare, and over time, seek an overall increase in residential densities to more than 20 dwellings per net developable hectare.*
  - *Create a network of mixed-use activity centres that are high quality, well designed and create a sense of place.*
  - *Provide a diversity of housing type and distribution.*
  - *Retain unique characteristics of established areas impacted by growth.*
62. The policy directs that Precinct Structure Plans are developed consistent with the Precinct Structure Planning Guidelines (GAA, 2009) and 'consider as relevant' the following other policy documents:



- *The Victorian Transport Plan (Victorian Government, 2008)*
  - *Any applicable Growth Area Framework Plans (Department of Sustainability and Environment, 2006)*
  - *Ministerial Direction No. 12 – Urban Growth Areas*
63. **Clause 11.03-6S (Regional and local places)** aims to facilitate integrated place-based planning taking into consideration specific direction for the planning of places and neighbourhoods taking into consideration distinctive characteristics and needs in future land use and development.
64. **Clause 12.05-2S (Landscapes)** aims to protect and enhance significant landscapes and open spaces that contribute to character, identity and sustainable environments.
65. **Clause 15.01-3S (Subdivision design)** provides objectives and strategies to ensure good design of subdivisions and sustainable neighbourhoods. New residential neighbourhoods should, including:
- *Creating compact neighbourhoods that have walkable distances between activities.*
  - *Developing activity centres in appropriate locations with a mix of uses and services and access to public transport.*
  - *Creating neighbourhood centres that include services to meet day to day needs.*
  - *Providing a range of lot sizes to suit a variety of dwelling and household types to meet the needs and aspirations of different groups of people.*
  - *Facilitating an urban structure where neighbourhoods are clustered to support larger activity centres served by high quality public transport.*
66. **Clause 15.01-5S (Neighbourhood Character)** seeks to support development that respects or contributes to a preferred neighbourhood character. The strategies include:
- *Ensure the preferred neighbourhood character is consistent with medium and higher density housing outcomes in areas identified for increased housing.*
  - *Ensure development responds to its context and reinforces a sense of place and the valued features and characteristics of the local environment and place by respecting the:*
    - *Pattern of local urban structure and subdivision.*
    - *Underlying natural landscape character and significant vegetation.*
    - *Neighbourhood character values and built form that reflect community identity.*
67. **Clause 16.01-1S (Housing Supply)** aims to 'to facilitate well-located, integrated and diverse housing that meets community needs'. Strategies include to 'facilitate diverse housing that offers choice and meets changing household needs by widening housing diversity through a mix of housing types' and 'plan for growth areas to provide for a mix of housing types through a variety of lot sizes, including higher housing densities in and around activity centres'.
68. **Clause 16.01-2S (Housing Affordability)** seeks to deliver more affordable housing close to jobs, transport and services. Improvements to housing affordability will be met by increasing housing choice and promoting good housing and urban design 'to minimise negative environmental impacts and keep costs down for residents and the wider community'.



## Local Planning Policy Framework of the Hume Planning Scheme

69. The Municipal Strategic Statement (MSS) and Local Policies provide local directions to implement State policy. The following policies are of particular relevance to consideration of this evidence statement, including:

- **Clause 21.02-1 (Managing Growth and Increasing Choice)** identifies relevant State policy directions and local strategy considerations to achieve State policy outcomes. The policy references the importance of Precinct Structure Plans for implementation. Local strategies include to ensure planning for large scale green-field communities provide a range of housing options and facilitate high density residential development within and around activity centres and train stations.
- Specific policy is provided to plan for and enable large scale change within the **Hume Corridor at Clause 21.02-2**. Growth is to be supported by improvements to the transport network and to *'reinforce the role of the Inter Urban Break as a permanent separation and conservation and landscape buffer between conventional density development areas'*.
- **Clause 21.03-2 (Housing)** identifies that Hume needs to accommodate a projected population of 345,500 people by 2041. It states that housing stock is overwhelmingly dominated by large, detached dwellings aimed at family households. While demand for this product will continue to dominate the market the need for more diverse, smaller and integrated housing opportunities will be necessary.

More specifically the policy identifies that *'uniformity of new subdivisions and the decreasing size of conventional lots provide limited opportunity for people to access different forms of housing as their housing needs change'*. Strategy 4.4 seeks to *'Ensure residential subdivisions provide a mix of lot densities, including larger lots and medium density development sites to facilitate a range of housing products'*.

Further strategic work refers to the preparation of a Housing Strategy to plan for diversity and growth. I note that Council has prepared and adopted the Hume City Council Housing Diversity Strategy (June 2020). The strategy applies to established areas of the Hume municipality only.

- **Clause 21.05-4 (Neighbourhood and other local centres)** provides guidance for the development and distribution of neighbourhood centres across the municipality. It includes policy to facilitate the integration of a diversity of higher density housing in and adjoining neighbourhood activity centres including supermarket based centres.

## Precinct Structure Planning Guidelines (2009, Revised 2013)

70. The Precinct Structure Plan Guidelines (2009) were prepared by the Growth Area's Authority (GAA, now VPA) and apply to the preparation of all precinct structure plans for new residential communities and new employment areas in Growth Areas. They provide a guide of what should be addressed in preparing or assessing a Precinct Structure Plan.

71. Part 1, Section 3 of the Guidelines refers to the Objectives of Growth Area Planning. Amongst others, Objective 2 aims to *'create greater housing choice, diversity and affordable places to live'*. It states that this can be met if, including:

- *Housing meets a range of population needs as the community ages and grows over time;*
- *There is an average net density of 15 dwellings per developable hectare or more;*
- *Higher density dwellings are located within and around activity centres, along bus routes and around railway stations and close to public open space;*
- *A range of lot sizes and housing styles is provided across the precinct;*

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72. Part 2, Element 2 of the Guidelines provides design response, outputs and standards to be addressed in the composition of preparing a PSP. The PSP should respond to the following standards at p. 21 of the Guidelines, including:

<b>S1</b>	<p>Housing across a PSP should achieve an average density of at least 15 dwellings per net residential hectare, which will be achieved by providing a range of lot sizes. Higher densities should be focused in and around town centres and public transport based on the following guidelines:</p> <ul style="list-style-type: none"><li>• Homes should be high density within a town centre.</li><li>• Homes should be medium or high density within the walkable catchment of a town centre.</li><li>• The PSP should identify opportunities for medium to high density housing in close proximity to a PPTN stop or station, a local bus stop, community facilities or open space.</li></ul> <p>For more information, see Clause 56.03-1</p>
<b>S2</b>	<p>A range of densities that enable a mix of housing types and sizes are provided across the precinct. See Clause 56.04-1</p>
<b>S3</b>	<p>The PSP can identify opportunities for affordable and social housing in and around town centres. See Clause 16.05</p>
<b>S4</b>	<p>Any retirement villages or residential aged care facilities should be located within a town centre or within 400 metres of a town centre and public transport stop. Permeability and accessibility through these areas is encouraged. See Clauses 56.03-1 and 56.04-1</p>

73. The 'walkable catchment of a town centre' is defined in the Guidelines (Glossary of Terms, p. 55) as 'within 400m of a neighbourhood activity centre, or 800m of a principle or major activity centre'.

#### Guidelines for Precinct Structure Planning in Melbourne's Greenfields (Draft for Public Engagement – September 2020)

74. The draft Guidelines for Precinct Structure Planning have been prepared for consultation by the Victorian Planning Authority (VPA). I understand that the Guidelines are subject to ongoing consultation and consideration at present and have not been formally adopted by the VPA at the time of writing this report.
75. The Guidelines provide specific guidance for the establishment of 'Viable Densities'. It states at p. 29 that 'the role of the PSP is to encourage a more nuanced approach to urban and streetscape design that supports diverse and viable densities' and 'the form of the PSP needs to acknowledge that opportunities for delivery of different housing types will evolve over time in response to market demand and developer readiness to supply'.
76. In application to a PSP, F.1 Housing Diversity (p. 31) provides 'Diversity of housing, including lot size and built form, to meet community needs, increased housing densities and integrated housing located close to existing and/or proposed services, transport and jobs'. The following General Principles are particularly relevant to the Subject Site:
- **F.1.1** Residential density should achieve higher densities closer to existing or proposed jobs, services and high-quality public transport.
  - **F.1.2** Target densities should be achieved in the long term. The arrangement of residential densities should be cognisant of likely development staging and market acceptance of proposed densities in the short-to-medium term.
77. Performance targets are provided to achieve housing diversity, which include:
- **T1** PSP should facilitate increased densities with a minimum of 30 dwellings or more per Net Developable Hectare (NDHA) where located within an 800m walkable catchment of an activity centre, train station or Principal Public Transport Network (PPTN) (or similar). Source: VPA target (density) Clause 56.04-1 (walkable catchments).





- **T2** PSP should facilitate increased densities with a minimum of 20 dwellings or more per NDHA across the entire PSP area. Source: Clause 11.03-2S

78. The draft Guidelines also provide principles and performance targets for Affordable Housing, including to set a minimum target in accordance with the Affordable Housing Practice Note.



## Assessment

79. As outlined earlier, the scope of my instructions is to consider the draft CWPSP and proposed Amendment to the Hume Planning Scheme in respect the Subject Site, in particular having regard to:
- the SFA submission;
  - the matters raised by the draft PSP (dated November 2020);
  - any regulatory framework applicable to the proposal, within my expertise to examine and comment on, having regard to the strategic planning background giving rise to the Amendment with consideration of relevant planning controls including strategies and policies in the Hume Planning Scheme;
  - my own judgement and experience; and
  - any other matter which I regard as relevant to the formulation of my opinion.
80. In undertaking my assessment I have reviewed the proposed objectives, requirements and guidelines of the exhibited CWPSP (November 2020); reviewed the background documents that have informed the preparation of the CWPSP and draft Amendment; had regard to relevant State and Local Planning policies of the Hume Planning Scheme and considered other relevant policy documents prepared by the State Government in relation to the preparation of Precinct Structure Plans.
81. The key matters arising from my review, as it relates to the Subject Site, for which I provide my opinion, include:
- Application of the proposed 'walkable catchment' boundaries;
  - Appropriateness of applied Density provisions;
  - Appropriateness of the proposed Affordable Housing provisions;
  - Adequacy of the guidance provided for the Local Town Centre;
82. I address each of the above matters below:

### Application of the proposed 'walkable catchment' boundaries

83. Plan 4 (Place Based Plan) of the CWPSP (November 2020) applies an approximate 400m radial 'walkable catchment' generally around the proposed Local Town Centre (LTC), mixed use area and government school.
84. I note the VPA Part A submission (dated April 2021) proposes minor alterations to the location of the LTC and refinement of the walkable catchment shown on Plan 4 in response to submissions, including to address the sensitive interface with the Mickleham Road inter-urban break.
85. I have not viewed a copy of a revised VPA plan associated with the Part A Submission, nor does it form part of my brief or instructions in this matter, therefore I provide my opinion based on the exhibited version of Plan 4.
86. The PSP Guidelines (2009, Revised 2013) provides the basis for defining the 'walkable catchment' as 'within 400m of a neighbourhood activity centre, or 800m of a principle or major activity centre'.



87. To support walkability, S1 of the Guidelines states that higher densities should be focused in and around town centres and public transport, including:
- *Homes should be medium or high density within the walkable catchment of a town centre.*
  - *The PSP should identify opportunities for medium to high density housing in close proximity to a PPTN stop or station, a local bus stop, community facilities or open space.*
88. This approach is reinforced by Outcome 5 of Plan Melbourne to create 20minute neighbourhoods and State policy for the location and housing and growth area planning.
89. I have undertaken an assessment of the general application of ‘walkable catchments’ within other recent PSP’s. Figure 7 below provides a table comparing a number of PSP’s prepared post the adoption of Plan Melbourne [2017].

Figure 7: PSP Walkable Catchment Comparison

Precinct Structure Plan (PSP)	Date	Walkable Catchment (shape)	Walkable Catchment (general distance applied)
<b>Craigieburn West</b> (Exhibited Only)	Nov-20	Radial	400m from LTC (Radius)
<b>Shenstone Park</b> (Exhibited / Panel)	Sep-19	Rectangular	400m from LTC
<b>Pakenham East</b>	Jul-20	Irregular (Defined by land use connection and topography)	400m from LTC
<b>Beveridge NW</b> (Exhibited / Panel)	Aug-19	Irregular (Defined by land use connection and topography)	400m from LTC
<b>Sunbury South / Lancefield Road</b>	Nov-19	Irregular (Defined by land use connection and topography)	400m from LTC 200m Community Hub 100m LCC
<b>Cardinia Creek South</b>	Mar-18	Rectangular	400m from LTC 200m Community Hub 100m LCC
<b>Minta Farm</b>	Oct-18	Irregular (applies to all residential land)	600m from PPTN 400m LTC 200m Community hub
<b>Lindum Vale</b>	Sep-18	n/a	n/a
<b>Plumpton / Kororoit Creek</b>	Dec-17	Irregular (Defined by land use connection)	Not specifically defined in PSP
<b>Donnybrook / Woodstock</b>	Oct-17	Irregular	400m from LTC 500m from Train Station 500m-800m from Train Station
<b>Mt Atkinson</b>	Jun-17	Irregular (Defined by land use connection and topography)	Not specifically defined in PSP

90. As identified in Figure 7 the arrangement of the ‘walkable catchments’ are generally irregular in shape and applied on a PSP specific basis following a detailed design and planning process (that is tested at Panel) for the preparation of the PSP.

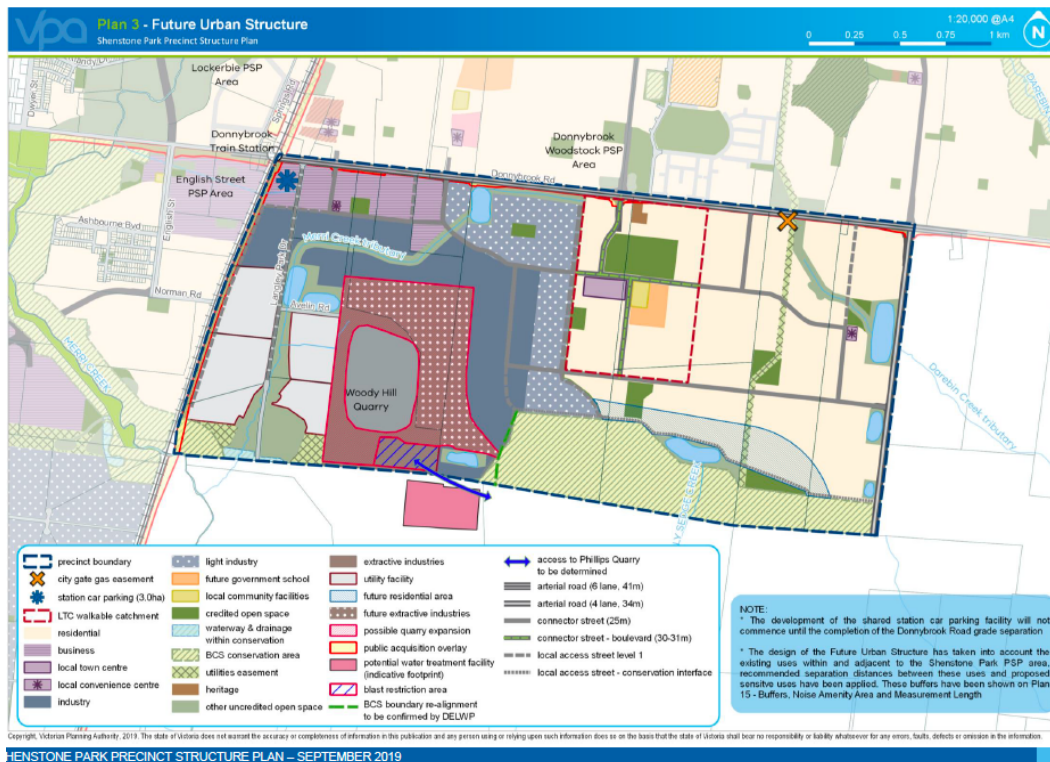
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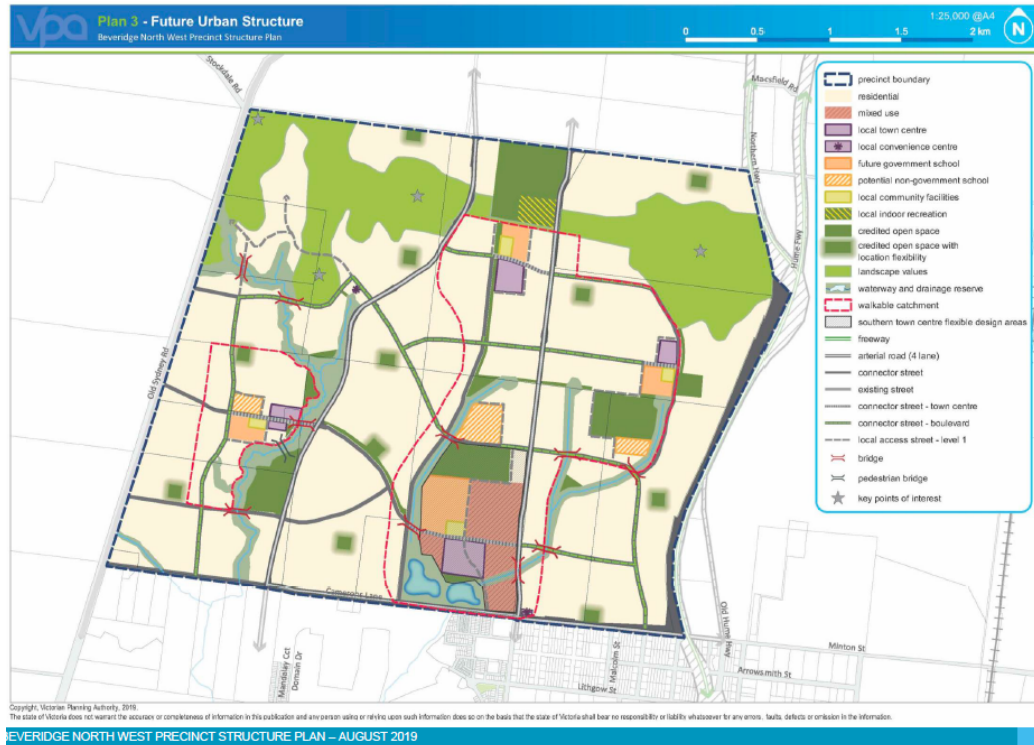
91. I note that the CWPSP is the only PSP to apply a radial approach to the walkable catchment boundaries. In my view the 400m metric should not be the sole determining factor used to define the catchment boundary. Per the PSP Guidelines and State policy references, other existing or planned contextual matters should be layered to shape the walkable catchment and maximise the achievement of 20-minute neighbourhood policy outcomes.
92. I consider the Shenstone Park, Beveridge North West and Pakenham East PSP's provide good recent examples of the application of LTC 'walkable catchments' based on context, whilst still having regard the 400m metric.
93. The Shenstone Park catchment alignment includes an LTC (8,500sqm of retail and commercial floor space) government school, passive and active public open space (major sports reserve – 8.45ha) and a local community centre. The catchment also immediately adjoins a major future employment area to the west. Refer Figure 8 below which provides and extract of FUS of the Shenstone Park PSP.

Figure 8: Extract of Plan 3 FUS of the Shenstone Park PSP (September 2019)



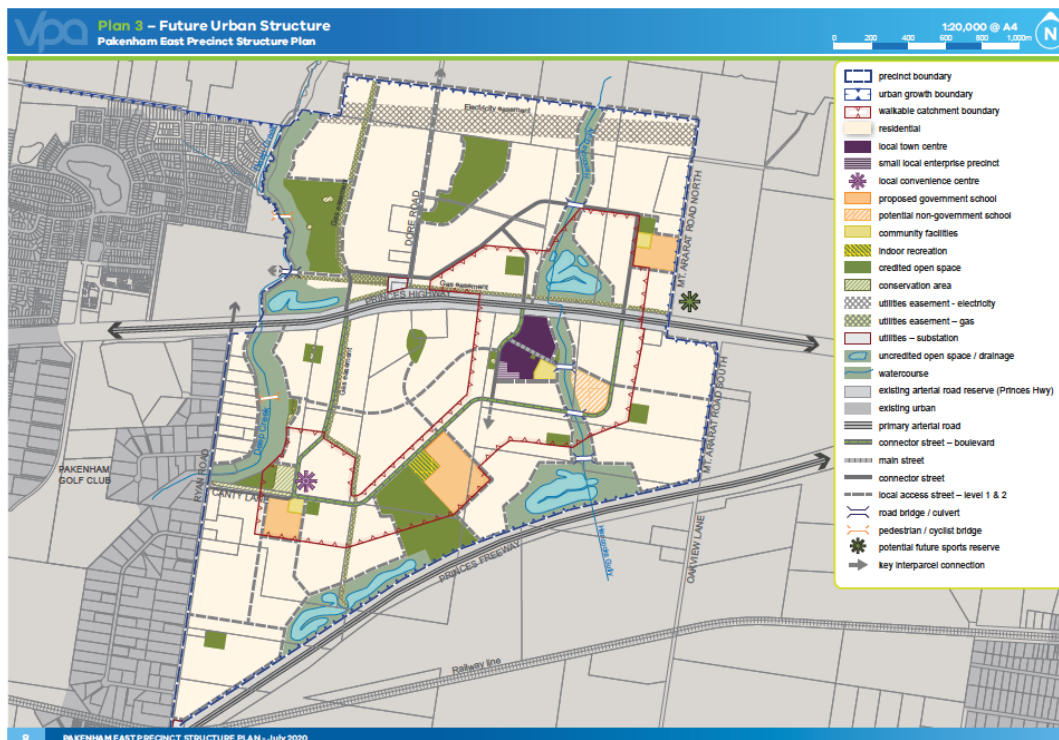
94. The Beveridge North West PSP walkable catchment of the western LTC (9,000sqm of retail and commercial floor space), two schools, passive public open and a local community centre. I note the nearby southern LTC (9,000 sqm of retail and commercial floor space) includes a major mixed use employment area (27.98ha), schools, passive and active public open space (major sports reserve – 12.02ha) and a local community centre. Refer Figure 9 below which provides and extract of FUS of the Beveridge North West PSP.

Figure 9: Extract of Plan 3 FUS of the Beveridge North West PSP (August 2019)



95. The Pakenham East PSP (July 2020) also provides a useful comparison. The walkable catchment includes an LTC (11,000sqm of retail and commercial floor space), school, passive and active public open space (part) and a local community centre. Refer Figure 10 below which provides an extract of FUS of the Pakenham East PSP.

Figure 10: Extract of FUS of the Pakenham East PSP (July 2020)



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96. I consider Beveridge North West (with particular reference the western LTC), Pakenham East and Craigieburn West PSP's share similar attributes in terms of the overall physical and strategic context, as well as the proposed land use composition, including the PSP:
- is located on the urban edge of the growth corridor and interface with Greenwedge land;
  - is not immediately proximate to any existing or proposed major employment areas;
  - is not served by a train station and will rely on future bus services to provide public transport connections to external employment areas; and
  - The LTC walkable catchment will deliver limited employment opportunities (Beveridge North West – circa 230 jobs; Pakenham East - circa 800 jobs; CWPSP circa 360 jobs).
97. In my view the extent of both the Beveridge North West and Pakenham East walkable catchments are more 'local context based', rather than providing an arbitrary radius around the planned LTC and specific relationship to employment or services. The irregular catchment boundary location responds to the topography of the land; planned connections to other community uses, including open space / schools; and the future public transport network. In my view this 'local context based' approach presents a more comprehensively planned, site responsive and nuanced outcome having regard to the existing physical and planned strategic context.
98. I consider the proposed 'walkable catchment' of the CWPSP LTC applies a blunt 'radial' application of the 400m metric, that fails to take into consideration the limited access to employment generating uses (within or proximate to the LTC), existing physical attributes, and planned community land uses and amenities within the context of the overall urban structure.
99. In my view a 'local context based' approach to the alignment of the proposed 'walkable catchment' for the CWPSP LTC is necessary and has been used in other PSP's.
100. From my assessment of the local context provided within the Place Based Plan (Plan 4) in proximity to the core of the LTC there is a clear north-south linear structure and connection established between highly valued planned features, including schools and parks. A future public transport route and linear open space reserves are proposed to link these local features by foot, bike and bus, creating 'key nodes', consistent with the vision of the PSP and 20-minute neighbourhood principles.
101. I consider that a more linear (north-south) approach to the alignment of the proposed 'walkable catchment' will better address the planned local context, support the viability of the LTC and mixed use area, the establishment of the proposed public transport network, and maximise the number of future dwellings with prompt access to key local amenities and services.
102. To visually represent a 'local context based' approach, I provide an alternative CWPSP LTC walkable catchment concept, overlaid on an extract of the draft Plan 4 - Place Based Plan below, at Figure 11 below.
103. The proposed alternative 'walkable catchment' aims to maximise density provision in and around the LTC and proximate key nodes of the planned urban structure in response to the 'local context' including:
- the absence of major employment generating uses within or immediately adjacent the LTC;
  - access and links with planned future schools (x 2) in close proximity to the LTC;



- access and links with planned major active open space (north - sports fields ) and passive open space (south - with existing establish trees to be retained) in close proximity to the LTC;
- access to future bus stops along the planned north-south public transport network linking key nodes surrounding the LTC; and
- the sensitive low density landscape character of the Greenwedge land to the west, providing a transition of density, lots sizes and building form from the west to the LTC.

104. Refer below at Figure 11- Alternative walkable catchment concept. Note: the area is represented spatially only (not to scale).

Figure 11: Alternative walkable catchment concept.



105. In my view the proposed realignment of the 'walkable catchment' will also more appropriately address the existing sensitive landscape interface with the Mickleham Road inter-urban break, the proposed requirements R1 and R4 of the draft CWPSP and State planning policy provisions in relation to character and sensitive landscapes.

106. I note based on the proposed radial 'walkable catchment' alignment, it may be possible for medium density housing, including apartment development, to locate in close proximity to Mickleham Road.

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107. While I note that the VPA Part A submission proposes changes to realign the walkable catchment along this boundary to *'allow the first row of lots (approx. 90 m inboard from the PSP Boundary) to develop at Standard Density, and not at the higher density outlined by the PSP'*, I consider a more substantial setback is appropriate to manage the transition between the low density character and landscape values to the west.
108. Providing a more substantial setback to the walkable catchment alignment to the west will enable a more 'local based' design response for future subdivisions and development to the established landscape character of Mickleham Road in perpetuity. A greater transition of density, lots sizes and housing typologies will, in my opinion, result in a more appropriate scale of building form and transition between the sensitive inter-urban edge and the denser urban area.
109. Further the likely subdivision pattern and larger lot sizes will result in increased opportunities landscaping (in the public and private realm) and reduced hard pavement areas associated with vehicle crossovers and laneways.

#### Recommendations:

110. I recommend the alignment of the proposed walkable catchment be amended to a north-south linear orientation that takes a more nuanced, site responsive and 'local context based' approach which is similar to Figure 11 of my evidence statement.

#### **Appropriateness of applied Density provisions**

111. Table 2 (Housing density guide and planned neighbourhood character) of the CWPSP applies the following minimum average density provisions for the Precinct:
- Standard residential outside walkable catchment – 18.5 dwellings per NDHA; and
  - Residential within walkable catchment – 26.5 dwellings per NDHA;
112. The overall average density target or minimum housing provision (number of dwellings) for the PSP area to deliver is not expressly stated in the CWPSP.
113. From my review of the relevant available background documentation to the CWPSP, including the Craigieburn West PSP1068 Background Report (Draft for Public Consultation – November 2020), no detailed metrics relating to the density targets or split between the walkable catchment area appear to be provided.
114. Density targets within Precinct Structure Plans have varied and continued to increase since the introduction of Plan Melbourne (2017).
115. The Guidelines for Precinct Structure Plans (2009, Revised 2013) states that medium to higher densities should be provided in PSP's within the 'walkable catchment' of neighbourhood activity centres (with a 400m radius), with an average density of 15 dwellings per NDHA.
116. Plan Melbourne acknowledges that residential densities are reaching approximately 18 dwellings per hectare (2017) and aims to *'over time, seek an overall increase in residential densities to more than 20 dwellings per hectare'* in Growth Areas (Policy 2.2.5).
117. The draft Guidelines for Precinct Structure Planning in Melbourne's Greenfields (Draft for Public Engagement – September 2020) contemplate minimum densities of 20 dwellings per NDHa across the PSP's, with increased densities of 30 dwellings per NDHa within an 800metre 'walkable catchment' of an activity centre (hierarchy undefined) or the principal public transport network.
118. The draft Guidelines represent a significant change to the approach undertaken in recent approved and exhibited PSP's. I note however that the draft Guidelines are yet to be finalised or adopted by the VPA. In my view it would be premature and inappropriate to give weight to the draft Guidelines at this stage.



119. I consider that the PSP Guidelines 2009, Plan Melbourne (2017) and the relevant state and local policy provisions of the planning scheme provide the most appropriate guidance to inform the drafting of the CWPSP (as has been applied to other recent PSP's).
120. I have undertaken a comparison of the application of density provisions within other recent PSP's. Figure 12 below provides a table comparing a number of PSP's since the adoption of Plan Melbourne (2017).

Figure 12: PSP Density Comparison

Precinct Structure Plan (PSP)	Date	Overall Average Density (Dw/NDHa)	Inside Walkable Catchment (Dw/NDHa)	Outside Walkable Catchment (Dw/NDHa)	Walkable Catchment (Defined / Metres approx.)
<b>Craigieburn West</b> (Exhibited Only)	Nov-20		26.5	18.5	400m from LTC
<b>Shenstone Park</b> (Exhibited / Panel)	Sep-19	18.90	25	17	400m from LTC
<b>Pakenham East</b>	Jul-20	16.55	22	17	400m from LTC / irregular
<b>Beveridge NW</b> (Exhibited / Panel)	Aug-19	20.00	25	18	400m from LTC
<b>Sunbury South / Lancefield Road</b>	Nov-19	15.00	17	15	400m from LTC / 200m Community Hub / 100m LCC
<b>Cardinia Creek South</b>	Mar-18	16.70	18	16	400m from LTC / 200m Community Hub / 100m LCC
<b>Minta Farm</b>	Oct-18	21.00	20	16	600m from PPTN / 400m LTC / 200m Community hub
<b>Lindum Vale</b>	Sep-18	16.50	n/a	n/a	n/a
<b>Plumpton / Kororoit Creek</b>	Dec-17	17.96	21	16.5	Not specifically defined in PSP
<b>Donnybrook / Woodstock</b>	Oct-17	16.50	25	15	500m from Train Station
			18		500m-800m from Train Station
			18		400m from LTC
<b>Mt Atkinson</b>	Jun-17	18.4	20	16.5	Not specifically defined in PSP

121. As outlined in Figure 12 the overall average density targets vary within and outside 'walkable catchments'.
122. I note that the density targets proposed for the CWPSP are higher than all PSP's exhibited / approved within the past 4 years both within and outside LTC 'walkable catchments'.
123. While not outlined in the Figure 12, I note some PSP's also include locations where 30 dwellings per NDHa, however these locations are generally within higher order Centres (Major and Principal Activity Centres).
124. From my review of the other PSP's assessed there does not appear to be a consistent approach to density targets when considering the spatial relationships with other contextual factors, in particular, planned employment and public transport routes internal and external to the PSP areas.



125. Both the Shenstone Park and Beveridge North West PSP's apply a density target of 25 dwelling per NDHa within the walkable catchment of the proposed LTC's. This is a rate less than that proposed for the CWSP of 26.5 dwellings per NDHa, the basis for which has been undefined or disclosed within the background reports to the draft PSP.
126. With reference to my assessment regarding the proposed 'walkable catchment' boundaries earlier in my evidence statement (paragraphs 83 to 110), from my review of the contextual relationships of existing and planned land uses within the Shenstone Park and Beveridge North West PSP's, I consider that the CWSP LTC 'walkable catchment' does not justify a greater density provision for the following reasons, including:
- The BNWSP LTC (southern) will deliver over 1,500 jobs (excluding home based) within the walkable catchment;
  - The Shenstone Park LTC walkable catchment immediately adjoins a major planned employment area to the west, which is proposed to deliver over 4,500 jobs (excluding home based);
  - The CWSP LTC walkable catchment will deliver circa 360 jobs (excluding home based);
  - The Shenstone Park PSP area is served by major public transport links along Donnybrook Road and through the employment area to the Donnybrook Trains Station (approx. 1.5km west).
  - Limited passive open space and zero Active Open Space is provided within the draft CWSP walkable catchment, while the Shenstone Park LTC walkable catchment includes 8.54ha of sports fields, while the BNW PSP Southern LTC walkable catchment also contains 12.02ha of sports fields; and
  - The draft CWSP walkable catchment extends into and immediately adjoins Greenwedge land to the west and standard residential land to the east, with limited additional employment generating opportunities surrounding.
127. The Pakenham East PSP applies a density target of 22 dwellings per NDHa within the LTC 'walkable catchment'. As discussed at paragraphs 95 to 97 of this evidence statement, I also consider that the Pakenham East PSP shares a number of similar physical and strategic contextual attributes to the draft CWSP. Having regard to these similar attributes I consider that a similar density target may be appropriate to apply to the CWSP LTC 'walkable catchment'.
128. While I support the increase of average densities in growth area's 'over-time' as per the directions of Plan Melbourne, I consider that such change should be incremental. In my view Figure 12 comparing the density targets over the past 5 years demonstrates incremental change has already occurred. In my view it is necessary to allow the industry time to develop more diverse and affordable housing products that meet the market requirements and address 'knock-on' detailed design considerations at the subdivision and engineering design stage.
129. In my view greater coordination between State and local government departments and utility providers is required to understand and improve design outcomes associated with increased densities so as to balance other competing policy positions relating to traffic and car parking requirements; amenity and urban character outcomes; and landscape and sustainability concerns, including managing the urban heat island effects.
130. From my experience the application of higher density requirements in greenfield areas has resulted in the delivery of smaller lot sizes (with narrower frontages and reduced depths) and limited delivery of other housing typologies including integrated housing and apartment developments.
131. The 'knock-on' effect has resulted in reduced private open spaces, reduced provision of landscaping opportunities (including canopy trees on private and public land), reduced





building setbacks, increased presence of hard paving in the streetscape (including increased number of vehicle crossovers and rear laneways) and changes to servicing requirements (including the location of easements for utilities and services). This may have both a negative impact on urban character and the cost of development, including housing affordability.

132. Market demand is an important consideration in the development of greenfield locations, which is acknowledged by the draft PSP guidelines at Clause F1.2 which states *'Target densities should be achieved in the long term. The arrangement of residential densities should be cognisant of likely development staging and market acceptance of proposed densities in the short-to-medium term'*.
133. When applied in a 'blanket approach', increased densities may result in negative urban character outcomes and fail to meet the market in the short to medium term. The provision of medium density housing, including apartments, needs to be considered in the context of longer term development staging and whether the location is adequately supported by its strategic and physical context within the PSP area. The quantum and timing of delivery of retail and community services surrounding lower order town centres may impact the viability of higher density outcomes, including apartment developments, in these in locations in the short to medium term.
134. Notwithstanding, having regard to Plan Melbourne directions, I consider it appropriate that the CWPSP target an overall average density upto 20 dwellings per NDHa, as per other recent prepared and approved PSP's.
135. I consider that a density target ranging between 22 to 25 dwellings per NDHa within the defined walkable catchment of the CWPSP LTC is appropriate given the existing and planned contextual factors of the PSP and walkable catchment area and given it is in line with densities applied in other similar PSP areas.
136. While I do not think it is necessary to specify an overall minimum density target or minimum number of dwellings to be produced in the PSP area, I do not consider that the density target outside the walkable catchment should be derived as a rudimentary outcome of the density targets set inside the walkable catchment.
137. I note it is also possible to deliver a diverse mix of medium density housing in other well serviced and high amenity locations throughout the CWPSP outside the defined LTC 'walkable catchment'. In particular, surrounding the existing the existing Mickleham Primary School to the north of the PSP and in the southern area of the PSP with immediate proximity to the recently constructed Aston LTC shops, school and major sports fields (located within the Craigieburn R2 PSP area). Such access to existing uses and amenities is unique opportunity in terms of the of staging and delivery increased densities in greenfield locations.
138. I therefore consider a density of between 17 to 18 dwellings per NDHa be applied to areas outside the walkable catchment of the LTC, similar to other recently prepared and approved PSP's.
139. Having regard to the Beveridge North West PSP and recommendations of the Panel in relation to density targets in that case, in order to assist the implementation of density over time I would also recommend the inclusion of similar wording as a note to Table 2 in the CWPSP, as follows:

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

Source: Beveridge North West PSP – Clean Copy - Appendix 3 to VPA Part A (August 2019), P.17.

#### Recommendations:

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140. I consider Table 2 (Housing density guide and planned neighbourhood character) of the CWPSP should be amended to apply the following minimum average density provisions for the Precinct:

- Standard residential outside walkable catchment – 17 to 18 dwellings per NDHA; and
- Residential within walkable catchment – 22 to 25 dwellings per NDHA;

141. I consider Table 2 (Housing density guide and planned neighbourhood character) should be amended to include the following note:

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

### **Appropriateness of the proposed Affordable Housing provisions**

142. Section 3.1 (Housing, subdivision & built form) within the CWPSP includes requirement R5, which states ‘an application for subdivision of land into residential lots or development of land for residential or mixed use purposes must provide affordable housing as defined by the Planning & Environment Act 1987 to the satisfaction of the responsible authority’.

143. Guideline G4, states:

*‘Applications for residential subdivision or development of land should provide up to 10% of the total number of dwellings forecast to be provided (and may be provided as constructed dwellings or land or otherwise).*

*The affordable housing should:*

- *be provided within walkable catchments where practicable;*
- *provide for a range of housing typologies to meet demonstrated local need; and provide for very low, low, and moderate income households’.*

144. I note that the draft Schedule 12 to the UGZ provides application requirements and decision guidelines to demonstrate whether the proposed subdivision or development will adequately contribute towards the provision of affordable housing.

145. The Planning & Environment Act (1987) defines ‘affordable housing’ as ‘housing, including social housing, that is appropriate for the housing needs of very low, low, and moderate-income households’.

146. I support the intent for inclusion of guidelines to encourage the provision of affordable housing within the CWPSP, however I consider the mandatory requirement of R5 is inappropriate; that the implementation of G4 is unclear; the percentage target is arbitrary; and the provisions do not appear to be derived from any strategic basis or local area direction provided to substantiate the guidance.

147. While I note State planning policy directions to support affordable housing are unambiguous, the documentation associated with proposed Amendment and backgrounds reports does not include any material that would give weight to the application of affordable housing targets proposed within the PSP.

148. I am unaware of the application of affordable housing targets in PSP guidelines in any other approved PSP’s. Notwithstanding, I note recent planning scheme amendments, such as Amendment C88 to the Hobsons Bay Planning Scheme, have defined affordable housing needs and targets based on a localised review and introduced statutory mechanisms into the planning scheme.



149. I note, however the Panel recommendations in relation to the Beveridge North West PSP that mandatory requirement were not supported but ‘affordable housing should be encouraged through guidelines in the PSP’, however:

*‘In the absence of a strategic study or assessment and a clear delivery framework for affordable housing, mandatory requirements and specific target metrics are not supported.*

*In the absence of legislation supporting mandatory contributions, the delivery of affordable housing should be through negotiation and voluntary agreements between the parties’.*

Source: BNWPSP, Panel Report (October 2020), p. 86.

150. In my view the mandatory requirements of R5, the application requirements of Schedule 12 and the inclusion of a percentage target within proposed guideline G4, without a local policy or strategic basis, or the use of any other statutory mechanisms will create confusion in their implementation and therefore should be deleted.
151. I note the VPA Part A submission proposes to modify the proposed requirements for affordable housing to align with the Panel recommendations of the Beveridge North West PSP. I support this change.

#### Recommendations:

152. I consider requirement R5, and the application requirements of Schedule 12 should be deleted, and guideline G4 of the CW PSP should be amended to delete the proposed percentage target, in the absence of a local area study identifying a specific target requirement.
153. In my view, Council (and / or the VPA) should undertake a review of housing affordability considerations in Hume City Council to understand current issues and provide clear direction for the introduction and application of housing affordability initiatives on a growth area wide basis.

#### **Adequacy of the guidance provided for the Local Town Centre**

154. Section 3.7 of the CWSPSP provides requirements and guidelines, including Table 7: Craigieburn West Local Town Centre – performance requirements & guidelines, to guide the future use, layout and design of the LTC. Appendices 4.3 & 4.4 provide more specific guidance for the design of the town centre.
155. I note that the CWSPSP does not include an LTC ‘concept plan’ to accompany and articulate the requirements and guidelines of the PSP, as is typical of other approved PSP’s.
156. While I do not consider it necessary that the PSP provides a ‘concept plan’ for the LTC, I have considered the specific design guidance as it relates to the potential relationship that the LTC will have with the Subject Site. In particular consideration of the potential interface and amenity conflicts between residential land use and commercial activities, including adverse amenity risks.
157. In my view there is limited reference within the design guidance contained within the PSP to ensure that the layout and design of the LTC, including back of house areas, has regard for the potential to cause adverse amenity implications on the surrounding residential area and proposed public realm.
158. It is suggested that an additional dot point is provided within Table 7 and Appendix 4.3 of the CWSPSP to acknowledge amenity considerations and appropriately integrate with the surrounding residential area as follows:

“The design and layout of the local town centre should have regard for the potential to cause adverse amenity impacts on the surrounding residential area and public realm

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(including linear open spaces) as a result of the location of back-of-house areas, deliveries and refuse storage and collection. Subdivision design and development should minimise adverse amenity conflicts”.

## Recommendations:

159. I consider the inclusion of an additional dot point (or similar) is provided within Table 7 and Appendix 4.3 of the CWPSP referred in paragraph 158 of this evidence statement.

## **Conclusion**

160. In conclusion, taking into consideration the matters considered in this evidence statement, I summarise my opinion as follows:

- The ‘walkable catchment’ of the proposed Local Town Centre (LTC) does not to take into consideration the existing physical attributes, planned land uses, amenities and the overall urban structure of the PSP which should be considered when defining the appropriate boundaries for where greater densities should be directed.
- A ‘local context based’ approach to the definition of the boundaries of the ‘walkable catchment’ of the proposed LTC should be applied to re-align the catchment area in a north-south linear shape to include the planned amenities north and south of the LTC; support the planned future public transport network; and provide a transition of density and housing form in response to the sensitive interface of the Mickleham Road inter-urban break.
- An average density target of 26.5 dwellings per NDHa is excessive taking into consideration the contextual factors of the PSP and the targets applied in other similar PSP areas. A density ranging between 22 to 25 dwellings per NDHa is more appropriate to be applied within the ‘walkable catchment’ of the proposed LTC.
- An average density of between 17 to 18 dwellings per NDHa is appropriate be applied to areas outside the walkable catchment of the LTC, having regard to similar other PSP areas and to appropriately increase densities in growth areas incrementally overtime.
- Requirement R5 and the application requirements of Schedule 12 should be deleted, and guideline G4 of the CW PSP should be amended to delete the proposed percentage target, in the absence of a local area study identifying a specific target requirement.
- Table 7 and Appendix 4.3 should include additional guidance to acknowledge and address the potential amenity conflicts that may arise from the design and layout of the LTC with the surrounding residential area.

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**A Different City Pty Ltd**

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## Appendix 1 – Statement of Qualifications and Expertise

### 1. Name and Professional Address of Expert:

Jonathon Cobbley Fetterplace  
Director  
A Different City Pty Ltd  
Level 2, 52 Albert Road  
South Melbourne VIC 3205

### 2. Qualifications and Experience:

I hold a Bachelor of Applied Science (Planning) and a Bachelor of Social Science (Environment), both from RMIT.

Professional experience is as listed below:

- 2019 to Current: Director, A Different City Pty Ltd
- 2012 – 2019: Director Planning & Design (and other positions), Dacland Pty Ltd
- 2004 – 2012: Director (and other positions), Urbis Pty Ltd
- 2003: Senior Consultant, Mouchel Parkman Pty Ltd
- 1999 – 2002: Urban Planner, Coomes Planning Pty Ltd
- 1999: Urban Planner, Stonnington City Council

### 3. Area of expertise includes:

- The development, design and planning of Greenfield master planned communities, including advice and management of project acquisition, capital raising, design development, planning, sales and marketing, and delivery phases of development projects.
- Private planning consulting advice and property development advisory services to a wide range of commercial clients addressing the design and management of urban development projects, statutory planning processes and project delivery strategies.
- Planning and development advice to project boards, development managers, project managers, architects, financial providers and other professionals involved in a range of property development projects and issues associated with the development of land.
- Statutory and strategic planning advice to State and Local Government on a range of residential, retail, commercial and industrial matters.

### 4. Expertise to prepare this report:

Professional qualifications and expertise in town planning, both in the public and private sectors and my expertise in property development having managed the planning and development of multiple greenfield master planned community projects for private developer, Dacland.

### 5. Instructions received in relation to this matter:

My instructions required me to undertake a review of the development considerations of the following:

- review and consider the exhibited Amendment documentation and SFA's submission to the VPA and provide my opinion (including recommendations) as to whether the Amendment is appropriate having regard to:

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- the SFA submission;
- the matters raised by the draft PSP (dated November 2020);
- any regulatory framework applicable to the proposal, which is within my expertise to examine and comment on, having regard to the strategic planning background giving rise to the Amendment with consideration of relevant planning controls including strategies and policies in the Hume Planning Scheme;
- my own judgement and experience; and
- any other matter which I regard as relevant to the formulation of my opinion.

In so doing, I have relied upon those matters outlined below.

## 6. Facts, Matters and Assumptions relied upon

I have relied upon the following in the preparation of this report:

- Inspection of the Subject Site and surrounds;
- Review of the relevant planning controls within the Hume Planning Scheme;
- Review of draft Amendment documentation;
- Review of the draft Craigieburn West Precinct Structure Plan (November 2020), exhibited documentation and background reports;
- Review of the submissions made on behalf of SFA Land Developments Pty Ltd regarding the drafting of the draft Precinct Structure Plan and draft Amendment;
- Review of copies of subdivision concept plans prepared for SFA Land Developments;
- Review of the submissions made by Council, relevant authorities and other parties regarding the draft Precinct Structure Plan and draft Amendment;
- Review of the Plan Melbourne 2017-2050 (Victorian Government, 2017);
- Review of the Precinct Structure Plan Guidelines (2009, revised 2013) and Guidelines for Precinct Structure Planning in Melbourne's Greenfields (Draft for Public Engagement – September 2020);
- Review of the Growth Corridor Plans – Managing Melbourne's Growth (Growth Areas Authority, June 2012) and Northern Growth Corridor Plan (Growth Areas Authority, 09 August 2012);
- Review of the Hume Corridor HIGAP Spatial Strategy, Hume City Council (December 2015) and Hume Housing Diversity Strategy, Hume City Council (June 2020)
- Review of relevant other Precinct Structure Plans and Planning Panel Reports including:
  - Shenstone Park PSP (September 2019);
  - Pakenham East PSP (July 2020);
  - Beveridge North West PSP (August 2019);
  - Sunbury South PSP (November 2019);
  - Lancefield Road PSP (November 2019);
  - Cardinia Creek South (December 2018)
  - Minta Farm PSP (October 2018);
  - Lindum Vale PSP (September 2018);
  - Plumpton PSP (December 2017);
  - Donnybrook Woodstock PSP (October 2017);
  - Mt Atkinson PSP (June 2017);
  - Craigieburn R2 PSP (2010);
- Review of PSP 1068 Craigieburn West PSP – Part A Submission, VPA (April 2021);

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## **7. Identity of persons undertaking the work:**

Jonathon Fetterplace

## **8. Summary of opinion:**

A summary of my opinions in relation to this matter is included at paragraph no. 79 to 159 of my evidence.

I have made all the inquiries that I believe are desirable and appropriate and no matters of significance which I regard as relevant have to my knowledge been withheld from the Panel.

Jonathon Fetterplace  
**Director**  
**A Different City Pty Ltd**



## Appendix 2 – List of Relevant Planning Policy and Other Policy Documents

<p><b>Relevant policies contained within the Hume Planning Scheme include:</b></p> <p><u>SPPF:</u></p> <ul style="list-style-type: none"> <li>○ Clause 11 Settlement <ul style="list-style-type: none"> <li>○ Clause 11.01-1S - Settlement</li> <li>○ Clause 11.02-1S - Supply of urban Land</li> <li>○ Clause 11.02-3S - Sequencing of Development</li> <li>○ Clause 11.03 - Planning for Places</li> <li>○ Clause 11.03-1S - Activity Centres</li> <li>○ Clause 11.03-2S - Growth Areas</li> <li>○ Clause 11.03-4S - Distinctive Areas &amp; Landscapes</li> </ul> </li> <li>○ Clause 12 Environmental Values</li> <li>○ Clause 15 Built Environment and Heritage <ul style="list-style-type: none"> <li>○ Clause 15.01-1S - Urban Design</li> <li>○ Clause 15.01-1R - Urban Design - Metropolitan Melbourne</li> <li>○ Clause 15.01-3S - Subdivision design</li> <li>○ Clause 15.01-4R - Healthy neighbourhoods - Metropolitan Melbourne</li> <li>○ Clause 15.01-5S Neighbourhood Character</li> </ul> </li> <li>○ Clause 16 Housing <ul style="list-style-type: none"> <li>○ Clause 16.01 Residential Development</li> <li>○ Clause 16.01-1S - Housing Supply</li> <li>○ Clause 16.01-3S Housing Diversity</li> <li>○ Clause 16.01-3R Housing Diversity - Metropolitan Melbourne</li> <li>○ Clause 16.01-4S - Housing affordability</li> </ul> </li> <li>○ Clause 19 Infrastructure <ul style="list-style-type: none"> <li>○ Clause 19.02-6S Open Space</li> </ul> </li> </ul>	<p><b>Relevant Current Policy Documents include:</b></p> <ul style="list-style-type: none"> <li>○ Plan Melbourne 2017-2050 (Victorian Government, 2017)</li> <li>○ Growth Corridor Plans - Managing Melbourne's Growth (Growth Areas Authority, June 2012)</li> <li>○ Northern Growth Corridor Plan (Growth Area's Authority, 09 August 2012)</li> <li>○ Precinct Structure Planning Guidelines (Growth Areas Authority, 2009)</li> <li>○ Guidelines for Precinct Structure Planning in Melbourne's Greenfields (Draft for Public Engagement - September 2020);</li> <li>○ Ministerial Direction No. 11 - Strategic Assessment Of Amendments (Planning &amp; Environment Act 1987, Minister for Planning, 30 July 2018)</li> <li>○ Ministerial Direction No. 12 - Urban Growth Areas (Planning &amp; Environment Act 1987, Minister for Planning, 10 June 2008)</li> <li>○ Hume Corridor HIGAP Spatial Strategy, Hume City Council (December 2015);</li> <li>○ Hume Housing Diversity Strategy, Hume City Council (June 2020)</li> </ul>
<p><u>LPPE:</u></p> <ul style="list-style-type: none"> <li>○ Clause 21.02 (Urban Structure &amp; Settlement)</li> <li>○ Clause 21.03 (Liveable Neighbourhoods &amp; Housing)</li> <li>○ Clause 21.04 (Built Environment &amp; Heritage)</li> <li>○ Clause 21.05 (Activity Centres)</li> </ul>	<p><b>Other Relevant Documents:</b></p> <ul style="list-style-type: none"> <li>○ Plan Melbourne - Metropolitan Strategy (Victorian Government, May 2014)</li> <li>○ Urban Design Guidelines for Victoria (Department of Environment, Land, Water and Planning, 2017)</li> <li>○ Shenstone Park PSP (September 2019);</li> <li>○ Pakenham East PSP (July 2020);</li> <li>○ Beveridge North West PSP (August 2019);</li> <li>○ Sunbury South PSP (November 2019);</li> <li>○ Lancefield Road PSP (November 2019);</li> <li>○ Cardinia Creek South (December 2018)</li> <li>○ Minta Farm PSP (October 2018);</li> <li>○ Lindum Vale PSP (September 2018);</li> <li>○ Plumpton PSP (December 2017);</li> <li>○ Donnybrook Woodstock PSP (October 2017);</li> <li>○ Mt Atkinson PSP (June 2017);</li> <li>○ Craigieburn R2 PSP (2010);</li> </ul>
<p><u>Particular Provisions &amp; General Provisions</u></p> <ul style="list-style-type: none"> <li>○ Clause 56 (Residential Subdivision)</li> </ul>	



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