
Victorian Planning Authority



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10-4-24

To whom it concerns,

Re: Shepparton South-east draft precinct structure plan

Thank-you for the opportunity to comment on the draft precinct structure plan.

At a high level, our group is deeply concerned by the continuing expansion of Shepparton's residential footprint into new greenfield sites. We consider that this ongoing urban expansion:

- reduces the availability of productive agricultural land;
- jeopardises Shepparton's claims to be one of Australia's 'foodbowl regions, as it continues to sacrifice farming land for residential and industrial purposes;
- will result in increased carbon emissions because of the loss of greenfield space and the need for new residents to drive everywhere;
- reduces the liveability of Shepparton as the city expands without sufficient supporting infrastructure, public transport, footpaths and open space.

We recommend that Council needs to set firm long-term limits to residential development within the local government area and develop new approaches to providing additional residential and living opportunities for the growing populations. In particular, we recommend the development of more medium-dense residential options within already developed areas which experiences from overseas have shown can lead to more community-focussed and more resilient human communities.

Our comments on the draft precinct structure plan are as follows.

1. The draft plan does not include a carbon footprint assessment of the impacts of the planned residential development on greenhouse gas emissions, nor any recommendations for how those emission impacts will be offset and reduced. Given Greater Shepparton City Council's declaration of a climate emergency and its commitment to net zero emissions by 2030, we expect much more concrete emission-reduction plans and targets to be included as part of this planning process.
2. The Plan does not provide a sufficient allocation towards open space (4.8% of land area), given that most of the existing land area provides an open space amenity value as


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agricultural land. That amenity value will be lost once a further 65% of this land area is developed for residential living. We suggest that at least 10% of the land area should be set aside for open space.

3. The Plan does not appear to include provision for ensuring that some biodiversity values and ecosystem-service values of native vegetation are retained, apart from the retention of the Broken River floodplain as a natural area and a recommendation to try and protect the remnant native trees. Our group considers that the transition of 65% of the land area from agricultural land to residential development will have impacts on local wildlife populations. In line with the Victorian Government's Biodiversity 2037 Plan commitment to a 'whole of government approach' approach to implementing the Plan (Priority 19), we expect a strategic planning document such as this one to consider those impacts and how to address them.
4. Human-powered transport (walking and cycling) and public transport should be given a much greater priority in the planning process, including establishment of direct paths to schools, shops and other amenities. The current plan appears only to provide a recreational path along the Broken River.
5. The plan should require higher environmental standards for the new homes, for example:
 - Maximum house size limits
 - Blocks orientated to optimise solar radiation opportunities
 - All houses to be at least 10 star rating
 - Open space requirements to be increased
 - All existing remnant trees to be maintained in enhanced open spaces
 - All roofs to be an appropriate colour to optimise albedo effect (lighter colours to ensure heat is reflected back into space)

Yours sincerely,


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Dr Doug Robinson (President), 

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