

Our Reference 322041  
Your Reference Shepparton South East Precinct Structure Plan

15 April 2024

Gareth Hately  
Strategic Planning Manager  
Victorian Planning Authority

Via email to: [sheppartonsoutheast@vpa.vic.gov.au](mailto:sheppartonsoutheast@vpa.vic.gov.au)

Dear Gareth

**Submission to the Draft Shepparton South East Precinct Structure Plan & Draft Greater Shepparton Planning Scheme Amendment C117  
27, 32 & 40 Feiglin Road, Shepparton (Property 32, 30 & 29)**

Spiire is acting behalf of Rendeovski Transport Pty Ltd, in relation to land at 27, 32 and 40 Feiglin 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 Este PSP
Submitter	Spiire on behalf of Rendeovski Transport Pty Ltd
Property Address	27, 32 & 40 Feiglin Road, Shepparton
Title Details	Lots 1 & 2 on PS823648 and Crown Allotment 17, Section D, Parish of Shepparton
PSP Property Number	Properties 29, 30 & 32
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:

- ▶ Removal of the Heritage Overlay from the site.
- ▶ Clarification on 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.
- ▶ Further consideration be given to affordable housing though 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 amendment documentation including the proposed Urban Growth Zone Schedule.
- ▶ Review of the design and sizing of the retardation basin.
- ▶ Reconsideration of the provision of a local park on the site and if required, consider alternative location within the buffer to the industry on Property 30.

## 2. SUBJECT LAND

The subject land is located at 27, 32 & 40 Feiglin Road, Shepparton. The following summarises the property particulars:

**Table 2: Property Summary**

PSP Property No.	Property Address	Title Details	Site area
29	40 Feiglin Road, Shepparton	Lot 2 on PS823648	12.17ha
30	32 Feiglin Road, Shepparton	Lot 1 on PS823648	1.159ha
32	27 Feiglin Road, Shepparton	CA17, Sec D, Parish Shepparton	18.2ha

### Property 32 – 27 Feiglin Road

27 Feiglin Road comprises 18.2 hectares and contains 3 dwellings and shedding to the north west corner of the land. Vehicle access is via Feiglin Road. A large portion of the land contains orchard trees.

To the immediate north of the site is a Goulburn Murray Water irrigation channel. The land to immediate east is a strip of land owned by Goulburn Murray Water and used by our client for orchard trees. Further east is Doyles Road. To the immediate south is 420 & 430 Doyles Road containing two dwellings and cleared farming land. To the immediate west is Feiglin Road.

### Property 30 – 32 Feiglin Road

32 Feiglin Road is 1.16 hectares and is occupied by Rendeovski Transport, a family owned freight transport business. It also contains a dwelling. Vehicle access is via Feiglin Road. To the immediate north is 26 Feiglin Road containing an existing dwelling. 40 Feiglin Road adjoins the land southern and western boundaries.

### Property 29 – 40 Feiglin Road

40 Feiglin Road is a relatively cleared parcel of land, formerly used as an orchard. Located to the immediate of the land is an irrigation channel and residential land. To the west and part of the southern boundary is Goulburn Murray Water drain. The land to the south zoned residential land being developed for standard residential purposes.



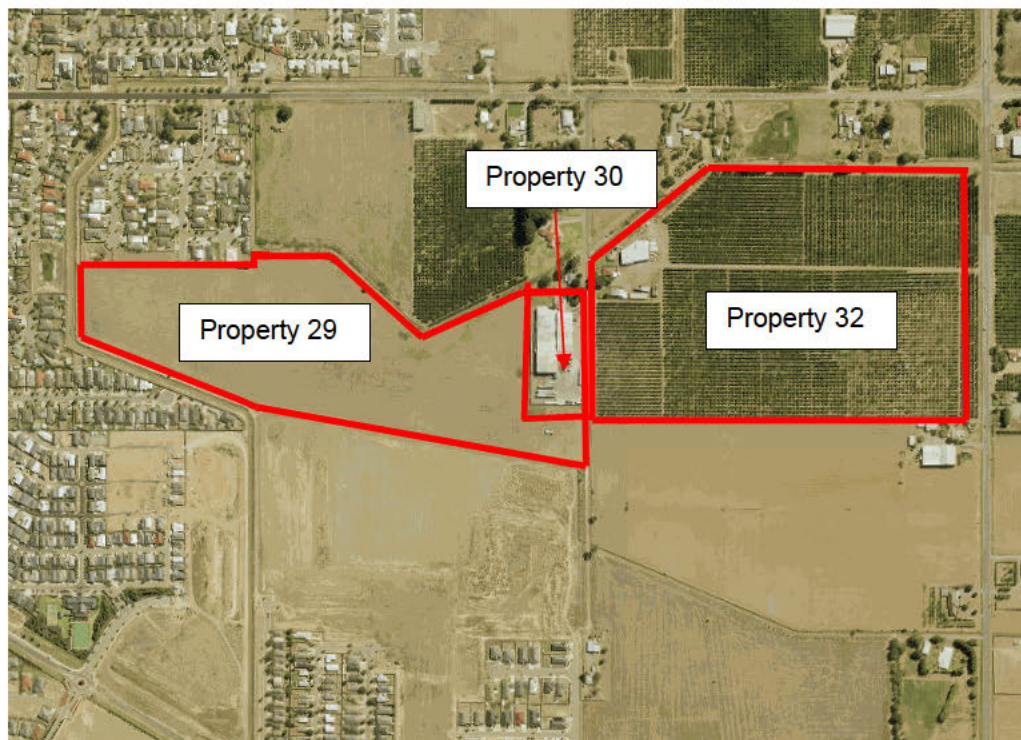


Figure 1: Site Locality Plan (Aerial)

### 3. GREATER SHEPPARTON PLANNING SCHEME

Pursuant to the Greater Shepparton Planning Scheme the subject land is within the Farming Zone - Schedule 1.

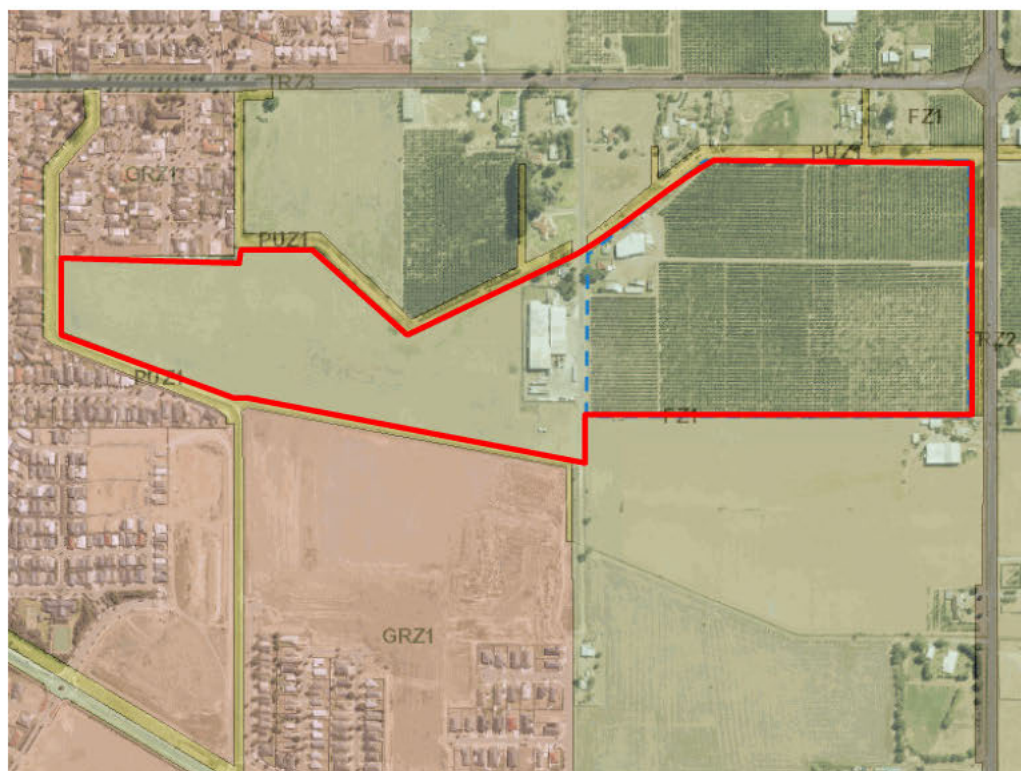
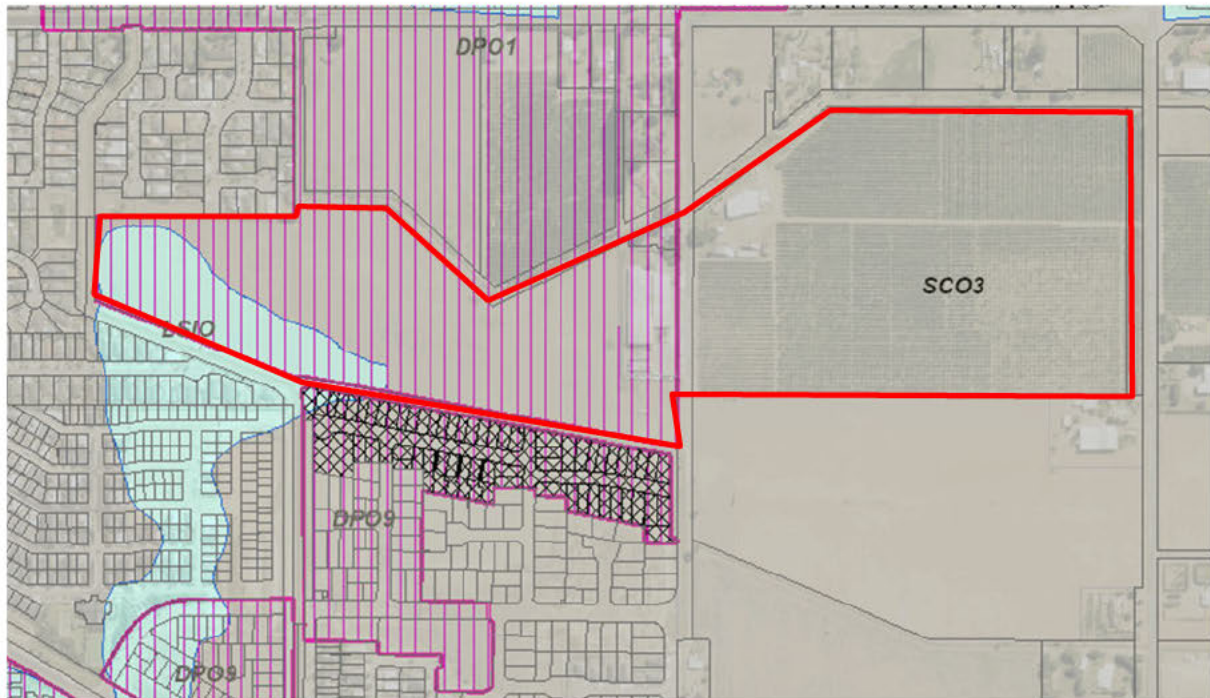


Figure 2: Zone Plan



All parcels of lands are in the Specific Controls Overlay – Schedule 3.

32 & 40 Feiglin Road are contained within the Development Plan Overlay Schedule 1 and 40 Feiglin Road is partly within the Land Subject to Inundation Overlay.



**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 sites lie within the boundary of the draft Shepparton South East Precinct Structure Plan (PSP) and have been identified as Properties 29, 30 and 32.

The Plan 3 (refer to Figure 4) in the draft PSP has identified most of the subject land for residential development with the western portion of 32 Feiglin Road for drainage and local open space.

Plan 5 – Character, Heritage and Housing identifies ‘*place of local heritage significance*’ on both 27 and 32 Feiglin Road.

Plan 7 – Open space and Community facilities identifies 32 Feiglin Road as a Waterway and drainage reserve and local park under LP-02.

Plan 8 – Bushfire Hazard Areas identifies the western portion of 32 Feiglin Road as a bushfire hazard area 2 (grassland 19m setback).

Plan 9 – Road Network identifies 32 Feiglin Road as an area where a local access street (16m) is to be constructed between the future open space and residential land.

Plan 12 – Integrated Water Management identifies retarding basin RBWL2 on the western portion of 32 Feiglin Road.

Plan 13 – Infrastructure & Development Staging identifies the land for medium term 5-15 years.

Plan 14 – Precinct Infrastructure Plan identifies waterway and drainage reserve and a local parks on the western portion of 32 Feiglin Road.





### **5.1 Public Acquisition Overlay**

The Public Acquisition Overlay appears to cover over 3 hectares of Property 29. Based on the Land Valuation Assessment, compensation is only proposed to be provided for 0.41 hectares. Our client seeks clarification why compensation is only proposed for this significantly smaller area.

The Land Valuation Assessments details compensation for 0.31 hectares of Property 32. Clarification is sort where the 0.31 hectares is and what is the land required for.

The compensation rate is \$260,000/hectare for the site. It is unclear from the exhibited documentation how this rate was calculated. Our client seeks further details and objects to current rate.

### **5.2 Heritage Overlay**

The Heritage Citation Report provided for 32 Feiglin Road does not adequately substantiate why the house on the property is of a significance to warrant the Heritage Overlay being applied. We have been unable to download the Heritage Citation Report for 27 Feiglin Road. Our client objects to the application of the Heritage Overlay to both properties. Our client is currently seeking independent heritage advice in relation to this matter.

### **5.3 Extent of Net Developable Land**

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.

It is requested the extent of undevelopable land be reviewed.

### **5.4 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.

### **5.5 Development Contributions**

The proposed Development Contributions for land within the PSP is \$411,223/hectare, which comprises levies per facility as shown in Figure 5 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
<b>TOTAL</b>	<b>\$411,223</b>	<b>\$0</b>

Figure 5: 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 3: 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
<b>Greater Shepparton</b>	<b>Shepparton South East</b>	<b>\$411,223</b>

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 5.4 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.

## 5.6 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.

## 5.7 Drainage Infrastructure

The proposed drainage basin on Property 29 is to be approximately 2.3 hectares. It is requested the design of the proposed basin on site be reviewed to minimise the extent of land to be taken up by this infrastructure. For example, the current design provides sedimentation basins and wetlands. Alternative options for treatment such as sedimentation basins with bioretention areas may reduce the size of the basin. A reduction in the land required for the basin and treatment area will likely reduce the overall costs of drainage infrastructure for the Precinct.

## 5.8 Open Space

Our clients question whether a local park is required in this location. Locating the park on the western boundary of the Precinct does not maximise the users of the park, particularly when access is restricted from the south and west by a Goulburn Murray Water drain. If the park is required, its submitted a more suitable location would be within the buffer area associated with 32 Feiglin Road (Rendevski Transport).



As detailed above, this submission seeks:

- ▶ Removal of the Heritage Overlay from the sites.
- ▶ Clarification on 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.
- ▶ 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 amendment documentation including the proposed Urban Growth Zone Schedule.
- ▶ Review of the design and sizing of the retardation basin.
- ▶ Reconsideration of the provision of a local park on the site and if required, consider alternative location within the buffer to the industry on Property 30.

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

Yours sincerely



Jane Macey  
Principal Planning