

16 July 2020

Development Victoria
Email: Knoxfield@development.vic.gov.au



A New Community in Knoxfield – Feedback on the draft Masterplan

Knox City Council appreciates the opportunity to provide a response to the draft masterplan for the 19.2ha site located at 609-621 Burwood Highway, Knoxfield. Council officers understand that Development Victoria (DV) is seeking feedback on the draft masterplan and its vision to create a vibrant new neighbourhood with a diverse range of sustainable housing options, public open spaces and recreational facilities.

In 2018, Amendment C160 was gazetted and subsequently rezoned the site from Public Use Zone (PUZ) and Urban Floodway Zone (UFZ) to the Comprehensive Development Zone – Schedule 2 (CDZ2). The amendment also:

- Varied the location of the existing Environmental Significance Overlays – Schedule 2 (ESO2) and Land Subject to Inundation Overlay (LISO); and
- Introduced the *Burwood Highway and Scoresby Road Knoxfield Comprehensive Development Plan – September 2018* (CDP) and the *Small Lot Housing Code, August 2014* into the Knox Planning Scheme. The CDP provides the vision, objectives and guiding principles for land use and development on the site.

At that time, Council provided feedback via a submission to the Government Land Standing Advisory Committee (GLSAC) and highlighted its preference for the site to be rezoned to General Residential Zone (GRZ) and Mixed Use Zone (MUZ) with a Development Plan Overlay (DPO), to ensure adequate master planning is undertaken prior to the subdivision of the site. In particular Council was concerned with:

- protection of biodiversity values;
- provision of social housing; and
- ensuring that development would effectively respond to the strategic context of the site.

These concerns remain relevant. Whilst Knox City Council strategically supports the redevelopment of this site and notes that the proposed Draft Masterplan is generally in accordance with some aspects of the CDP, Council officers have identified a number of concerns to be considered and addressed as part of the permit application process. The following comments are made on a without prejudice basis.

i. Residential Use

The proposed residential area of the draft masterplan is considered to be generally in accordance with the CDP. It is noted that the draft Masterplan is proposing approximately 450 dwellings with heights of two or three storeys. It is submitted that the draft masterplan should consider locating dwellings of lesser building height to the north of the site, close to the proposed wetlands. This would allow for dwellings of greater building height to capitalise on views to the wetlands and respond sensitively to the creek environs and neighbouring residential area.

ii. Mixed Use

The proposed location of the Mixed Use precinct is considered to be broadly in accordance with the CDP. Further iteration of the draft Masterplan should reflect the following directions:

- Provide a small amount of local convenience retail and support local employment opportunities in the mixed use precinct, as set out in the vision for this site within the Knox Central Structure Plan.
- Provide a “landmark built form on (the) corner” of Burwood Highway and Scoresby Road as noted in the CDP.
- Recognise that the Mixed Use precinct is part of the Burwood Highway Corridor and needs to respond to its strategic context. The vision for this corridor is outlined in Clause 21.10-2 of the Knox Planning Scheme, as follows:

The Burwood Highway Corridor overlaps with a number of precincts and will provide a distinctive, high quality and consistent built form. The Corridor will also provide a contemporary entrance to Knox Central, greater activation to the public realm, legible connections across Burwood Highway and development that strongly relates to the surrounding landscape character by delivering a tree-lined boulevard.

The Knox Central Structure Plan provides further direction in this regard with built form guidelines (p.40), including 8m street setbacks and a further 6m building setback above 4 storeys. On page 49, there are further design objectives to be considered for the entire site. Of particular relevance to the Mixed Use precinct, are active frontages at ground level and prominent, high-quality built form to mark the corner of Burwood Highway and Scoresby Road. Future design should incorporate street-tree planting in accordance with Knox’s Green Streets Policy, and should provide a shared path along the length of the Burwood Highway frontage.

iii. **Environmentally Sustainable Design**

Council officers expect to discuss environmental sustainable design standards to be achieved as part of the development.

From a holistic sense, regarding the site in its entirety, bench-marking against a Green Building Council of Australia’s (GBCA) minimum 4 star Green Star Communities framework should be pursued to ensure that broad Environmentally Sustainable Development (ESD) outcomes are achieved. When considering the site from a subdivision and staged development process, each stage should entail a Built Environment Sustainability Scorecard (BESS) assessment with a 70% score pursued; representative of design ‘Excellence’, as well as, a Sustainability Management Plan provided. ESD commitments to both residential and mixed use developments must be clearly identifiable and delineated in respective documentation. Implementation of design standards and quality design outcomes are expected to be committed to and captured in a section 173 agreement or equivalent instrument to ensure that each building asset provides consistent ESD outcomes.

From a Knox Planning Scheme perspective, the layout and design of the residential and mixed use blocks should respond to ESD objectives articulated in Clauses 21.05 and 22.04. Council’s ESD policy (Clause 22.04), as well as general ESD expectations for development requires that Best Practice development outcomes are demonstrated across the areas of Energy Efficiency, Peak Energy Demand reduction, Indoor Environment Quality, Integrated Water Management, Waste, Transport and Urban Ecology outcomes. Additionally, the particular provision for Residential Subdivision in Clause 56 of the Knox Planning Scheme must be addressed. Notwithstanding a Clause 56 response to Integrated Water Management which pertains to the entire site, each subdivision or stage is required to provide a tailored response ensuring that Council’s Integrated Water Management standards are satisfied, which entails that volume/flow control, peak flow, stormwater quality and water efficiency are managed, beyond the expectation in providing a wetland and supporting biodiversity.

Council’s ESD officer is also aware of the works undertaken by Development Victoria’s Sustainability Manager, Samantha Peart, to support elevating ESD requirements and ensuring strategic Best Practice outcomes for State Government Projects. Council officers welcome the opportunity to discuss with DV the

ESD objectives and requirements envisaged for this project with the aim of demonstrating leadership and showcasing a local development that achieves exemplary ESD outcomes.

iv. Wetland Biodiversity and Open Space

The northern portion of the site falls within a Site of Biological Significance, as outlined in *Sites of Biological Significance in Knox – Second Edition Volume 2, 2010*. This document outlines specific biological and environmental values of the Blind Creek corridor, which runs through the northern section of the site. These values are identified below:

- *All the native vegetation in this site (Blind Creek Corridor) belongs to Ecological Vegetation Classes that are regionally endangered or vulnerable*
- *While most of the native vegetation is fragmented and has little understorey, there are some patches in fair ecological condition and a tiny fraction that is in good ecological condition*
- *Blind Creek is a corridor for daily and seasonal movements of birds and insects, which may also transport pollen and plant propagules*
- *The site includes a dam at the Knoxfield Institute of Horticultural Development (the subject site) that is visited by a wealth of waterbirds, including threatened species.*

The proposed masterplan, including the proposed changes to the dam and construction of wetlands, needs to be substantiated by an assessment, acknowledgement and response to these identified values. It is noted that the information on the public consultation website does not include such work at the current point in time.

The *Preliminary Ecological Assessment of the Floodplain at 609-621 Burwood Highway, Knoxfield* report assesses the ecological impact of the site and identifies the need to protect native vegetation and threatened species. In particular, the following suggestions for any proposed redevelopment are made:

- *The treed vegetation between the existing dam and the Blind Creek Trail should be retained, with water still lapping on what is currently the dam's northern shore. The vegetation is partly dependent on adjacent water, so it could be killed if the dam is drained or filled. The construction of a retarding basin levee over the trees' root systems could also kill them, including trees just north of the property boundary;*
- *The design should include an open waterbody that is similar to the existing dam in its depth and submerged vegetation but with gradually sloping edges;*
- *Any reduction in the size of the waterbody will also impair the habitat for shy water birds like Blue-Billed ducks that keep their distance from shores with public access; and,*
- *To allow the less common waterbirds to breed and provide them with enough separation from humans and dogs, the waterbody should extend well away from the publicly accessible part of its shore. Some parts of the shore should be inaccessible to humans and dogs, as at the nearby Lakewood Nature Reserve. To provide separation between waterbirds and humans, the area of the wetland system should at least be comparable to the existing dam.*

Further, the report states that *"it would take some years for a new waterbody to provide similar habitat value."* The design and construction of the proposed wetlands should be cognisant of the time it will take to transition from the existing to the new habitat. Precautions and measures should be considered and taken to ensure the re-establishment of wetland values, ongoing monitoring and mitigation in the event of failure.

To assist in any further planning and design of the proposed wetlands, open space and landscaping across the site, the following comments are submitted for consideration:

- Knox City Council and Melbourne Water are currently developing designs for daylighting Blind Creek, including adjacent to the site.

- The integration of water from the development into the waterway will be an important consideration in the design of the development.
- The design should balance water quality, liveability for people, and protection and enhancement of local flora and fauna.
- The proposed wetland supporting biodiversity should ideally be completely separate from the stormwater treatment system.
- The proposed wetland design should be informed by an ecologist with understanding of the Blue Billed Duck (and other local species using the wetland). The current wetland (lake) provides an intact indigenous system.
- The future wetland should, at a minimum, provide the same flora species and habitat values that lake provides.
- Stormwater water sensitive urban design (WSUD) must allocate desilting area away from remnant vegetation.
- Any detailed infrastructure proposed in the public open space/play spaces will be reviewed and considered by Council as the future owners of the assets.
- The connection for people to, from and along the adjoining Blind Creek trail needs an integrated approach with cycling and pedestrian crime prevention through environmental design (CPTED) principles.
- Highly utilised areas may need lighting, but design must ensure minimal impact on local fauna as the site abuts and incorporates an important habitat corridor.
- Conservation/habitat areas must not include lighting.
- Remnant trees and vegetation should be incorporated into the design of the site. Vegetation removal is to be considered via the 3 step approach – avoid, minimise, and offset (as a last resort).
- Development design needs to include local trees/vegetation species across the site, providing habitat connectivity for local fauna species to move/feed/roost/nest outside of the Blind Creek corridor.

v. Access and Connectivity

The CDP encourages “walkability, pedestrian and cycling connections to the Blind Creek trail”. This is also supported by Clause 21.10-2 of the Knox Planning Scheme. The proposed walking/cycling trail and extent of open space in the draft Masterplan is generally in accordance with the CDP and creates a significant buffer between the proposed residential development and the Blind Creek corridor.

In terms of vehicle access points, the CDP aims to “provide for signalised vehicular access point at the intersection of Scoresby Road and Applegum Crescent, subject to VicRoads requirements”. The map within the CDP clearly marks this point as a “key vehicular access/egress point”, but it is not clear if it is to be signalised. A signalised intersection is required at this location.

The CDP also outlines two “possible future access/egress points” on the western boundary of the site.

- North western access – It is unclear if the draft Masterplan is proposing an access point at the north western part of the site, and where that access is intended to connect to.
- South western access – This is clearly shown on the draft Masterplan and indicates access to land to the west of the site.

The south-western access is supported by the Knox Central Structure Plan, as well as the CDP, which shows an indicative road link between the site and Knox Central to the west. Further clarification is sought from DV as to how this access will be achieved. Any future development of the site should not limit the opportunity for an east-west connection to Knox Central at this access point.

The interface between the Mixed Use precinct and the residential area to the north raises amenity concerns, in particular with functional access for commercial delivery vehicles and their potential disruption to the neighbourhood.

vi. Social & Affordable Housing

The site is identified as a Strategic Investigation Site in the Knox Housing Strategy, which also aims to increase the supply of social and affordable housing in Knox. The *Knox Affordable Housing Action Plan* and the Knox Planning Scheme seek to increase the supply of social and affordable housing, particularly on strategic sites and large development sites. This is also supported by *Plan Melbourne 2017-2050*, policy 2.3.3.

There is a well recognised and critical shortage of social and affordable housing in Knox, and this site provides a unique opportunity to facilitate an increased supply of social and affordable housing in the heart of a major activity centre, with access to jobs, services and public transport, in accordance with both State and local housing policy. As a Government Authority, we expect that increasing the supply of social and affordable housing is an aspiration that Development Victoria also wholeheartedly shares.

In accordance with the *Knox Affordable Housing Action Plan*, Council seeks a minimum social housing allocation of 5% of the overall number of dwellings on the site, to be provided as part of any future residential subdivision. However, officers note that the CDZ2 in the Knox Planning Scheme requires the provision of up to 10 per cent of dwellings in the form of affordable housing. In line with the *Knox Affordable Housing Action Plan*, Council would welcome the opportunity for discussion/contribution towards the possible future provision of social/affordable housing.

Officers understand that Development Victoria is working towards preparing a subdivision planning permit application for the project to be lodged with Council in late 2020. Further refinement of the draft masterplan and the preparation of a subdivision plan as part of the permit application process should have regard to the comments made above, as well as the Knox Central Structure Plan

Development Victoria has been in contact with Council's Statutory Planning officers to discuss the subdivision plan. Council officers understand that these discussions are expected to continue after consultation on the Engage Victoria website closes on 17 July 2020. Additional comments may be forthcoming subject to further discussions and the lodgement of a formal application.

Thank you for the opportunity to comment. Council officers look forward to achieving a balanced and appropriate development outcome for this site commensurate with its strategic importance in the City of Knox. [REDACTED]

[REDACTED]

Yours sincerely,



Matt Kelleher
Director City Development – Interim Finance and Governance

[REDACTED]