



CONSULTATION REPORT

21A Copernicus Way, Keilor
Downs



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EXECUTIVE SUMMARY

This report has been prepared by Urbis on behalf of Baptistcare Affordable Housing to summarise the Community consultation undertaken for the proposed social housing dwellings at No. 21a Copernicus Way, Keilor Downs (“the site”) funded under the Rapid Grants Round of the Social Housing Growth Fund. The report explains the consultation approach, how engagement with the community has occurred, key stakeholders, and presents a summary of the key insights and submissions received that will be used to inform the preparation of an application pursuant to Clause 52.20 of the Brimbank Planning Scheme.

PLANNING SCHEME AMENDMENT VC190

Gazetted on the 1st of December 2020, Amendment VC190 introduced a new particular provision into all Victorian Planning Schemes. Titled ‘Victoria’s Big Housing Build’, **Clause 52.20** of the Victoria Planning Provisions was gazetted to expedite the planning process for the development of housing projects by or on behalf of the Director of Housing. These streamlined planning provisions include development standards which seek to limit amenity impacts, ensure good design outcomes and appropriate car parking provision.

Clause 52.20 removes the need for a planning permit to develop a housing project if funded under Victoria’s Big Housing Build and supported by the Director of Housing, with a planning ‘approval’ or ‘consent’ granted in place of a permit. The amendment also specifies the Minister for Energy, Environment, and Climate Change to be the Responsible Authority under Clause 72.01.

Inclusive of **Clause 52.20**, is a requirement to undertake community consultation prior to an application being submitted to DELWP.

SUMMARY OF CONSULTATION

Table 1: Consultation Summary

| Summary of Consultation | |
|---|--|
| Consultation period | 5 October 2021 – 26 October 2021 |
| Number of Notices sent to owners / occupiers within 150m radius of the site | 201(including architectural and landscape plans) |
| Service Providers notified | N/A |
| Number of submissions received | 95 submissions 1 Petition (1380 signatures at the time of finalising this report) |
| Other consultation activities | Phone calls to Councillors Kerr and Lancashire, 6 October 2021, and Councillor Rasic – 6 and 11 October 2021 |
| Online Consultation Session - 12 October 2021 | 37 Attendees |
| Councillors | The proposal was considered at a Council meeting on 19 October 2021 |
| Information provided for consultation | Architectural and landscape plans, reports including Civil, ESD, Planning, Services, Traffic. |

1. INTRODUCTION

This report describes the consultation undertaken in relation to the proposed development of No. 21A Copernicus Way, Keilor Downs with 47 dwellings within single and double storey forms. The proposal provides one car space per dwelling, and includes a new internal access road and landscaping across the site. The proposed design response is shown below:



This consultation report has been prepared to satisfy the consultation requirements at Clause 52.20-4. This report seeks to:

- Outline the various methods of consultation undertaken, and the groups consulted with
- Sets out feedback received
- Sets out the manner the feedback has been considered by the client and project team and provides a response to each key message. These responses set out why the proposal has changed or not changed in response to each matter raised.

Key changes made to the proposal following the consultation period are summarised below. Full lists of the changes made in response to community and Council feedback are provided at Section 3 of this report.

- Sight splays added to centrally located dwellings at road bends, with subsequent adjustments to lot sizes (Type C lots reduced to 21m deep from 22m, Type D lots increased from 21m to 21.5m deep in order to accommodate splays whilst still providing appropriate private open space outcomes)
- Footpaths realigned to 90 degrees across driveways, and pram ramps added
- Radii on road bends adjusted to allow for simultaneous movement of two B85 vehicles
- A new outfall drain connecting directly to Council Stormwater Pits located on Melbourne Water mains
- A fully resolved Landscape plan is provided, showing planting across the site including within the pocket park, road reserves, around car parking spaces, and within front and rear setbacks of each dwelling

- Secure lockable windows and door screens provided to improve ventilation
- Solar PV systems revised to 4kW panels for each home
- Visitor and resident bicycle racks provided
- The '4-bin' waste system added
- Medium roof colour incorporated to reduce UHI effect
- Double glazing specified
- Ceiling fans added to all homes
- Commitment to 90% of timber in the project being either recycled, FSC or PEFC certified

2. CONSULTATION APPROACH

2.1. COUNCIL

A pre-application meeting occurred with Council on 24 August 2021 (online). Under the consultation phase, Council was formally referred the draft proposal on 27 September 2021.

Feedback received from Council is set out at Section 3.1, along with changes made to the draft proposal in response to Council feedback.

2.2. REFERRAL AUTHORITIES

Clause 52.20-5 requires comments from a referral authority who would have been referred a copy of the application under Section 55 of the Planning and Environment Act 1987 were it not for the exemptions in clause 52.20-2. There are no referral authorities identified within the Brimbank Planning Scheme relevant to the proposed development. No significant negotiations with service providers in relation to infrastructure assets are anticipated.

2.3. COMMUNITY

A mailout totalling 201 accompanied by architectural and landscape plans was undertaken by Council on behalf of Bapcare Affordable Housing. All owners and occupiers within 150m of the site boundaries were notified (see consultation mailout radius map below). In addition, a sign was erected on site for 21 days at the end of Thornhill Drive, adjacent to where the proposed access to the site is to be located. At an unknown point thereafter, the sign was relocated by an unknown party to a different location on the subject site, further to the north along the sidewalk along Copernicus Way. This fact was discovered by a representative of the applicant on Tuesday 26 October 2021 upon attempting to remove the sign from its original location at the closure of the consultation period.

An online consultation meeting was held on Tuesday 12 October 2021 via Zoom from 6pm to 8pm. A total of 37 attendees from the local community and an additional 10 attendees representing Bapcare, Urbis and Clarke Hopkins Clarke were present. This consultation meeting provided information on BAH, the proposal and the planning process, the level of demand for affordable housing in the area and allowed for questions and discussion with the project team.

A total of 95 submissions were received (refer redacted submissions at Appendix C). An email response was provided to each submission or enquiry received, with further information or clarification provided where necessary / requested by the submitter. A number of telephone enquiries and discussions were also held with individuals who sought to discuss the proposal and the process further. These individuals were encouraged to put their submissions in writing.

The feedback received from the community, along with how it has been considered and responded to, is outlined at Section 3.2 of this report.

2.4. OVGA

A review by the Office of the Victorian Government Architect is required for projects in excess of three storeys or 100 dwellings. Given the proposal is for 47 dwellings with a maximum height of two storeys, the proposal was not required to undertake an OVGA review.

Figure 1: Consultation Mailout Radius Map



21A COPERNICUS WAY, KEILOR DOWNS

SITE LOCATION

3. CONSULTATION FEEDBACK

3.1. COUNCIL

Council were initially briefed on the proposal during the Rapid Grants Round in March 2021. At this point, feedback was sought on a preliminary concept design and layout. Council was generally supportive of the proposal and provided a number of high level comments, in addition to more specific guidance around the design of roads within the site if these roads were to be vested in Council in future.

Comments were received from Council on the draft application on 15 October 2021, relating to internal referrals and general comments from the Statutory Planning Department. These comments and the responses are discussed below:

Table 2: Council Internal Referral Comments

| Feedback | Response | Reference |
|--|--|-------------------------------------|
| Traffic | | |
| Corner properties have not been provided with splays as per our sub-division standards and guidelines. | Splays have been incorporated to Type D dwellings, with slight adjustments across the site layout to accommodate these splays. | TP05, OneMileGrid FLP |
| Footpaths do not align at 90 degrees, e.g. across the extended driveways. | Footpaths have been adjusted | OneMileGrid FLP and report, page 11 |
| There is no footpath connections from the blue properties to the pink properties in the middle. | Footpath connections with pram ramps have been added. | OneMileGrid FLP and report, page 11 |
| Vehicle crossover splays have not been shown to Council current standards with 1200mm splays. | Crossover splays have been indicated and will be designed in accordance with Council Standard Drawings | OneMileGrid FLP and report, page 11 |
| Radii on the inside of the bends seems too small and need to be increased. | A 3.5m inner radius and a 7.5m outer radius have been provided at bends, which accommodate to B85 vehicles simultaneously. | OneMileGrid report, page 11 |
| FLP and detail design is required. | A Functional Layout Plan (FLP) is provided. | OneMileGrid FLP and report, page 11 |
| Vehicles parked off the laneway raise concerns as they their overhang can hit the dwellings, ideally there should be a kerb and channel setback enough to prevent the vehicle overhang from hitting the dwellings. | Wheels stops are shown on the FLP and will be installed in accordance with AS2890.1 | OneMileGrid FLP and report, page 11 |

| Feedback | Response | Reference |
|---|--|---|
| End car parking spaces adjacent to the footpath require a buffer/separator between the car space and the footpath. | A 500mm buffer has now been provided between spaces running alongside footpaths. | OneMileGrid FLP |
| Urban Design | | |
| In reviewing the landscape concept plan and site plan, it seems that some of the locations of some of the proposed pits and underground services are too close to the proposed locations for some of the trees. It is required to provide further information and amend drawings to make sure that there is enough space for a tree without being interrupted by a pit or underground services. | The civil sketch demonstrates how services offsets in line with Brimbank requirements will be achieved. | FMG Engineering |
| A cross-section is required to provide more info regarding trees and underground services, etc. | A cross section will be completed during Detailed Design. Refer Civil sketch | FMG Engineering sketch |
| The landscape plan is just a conceptual landscape plan. A detailed landscape plan is required (show all proposed species and location, trees, shrubs, dimensions of garden beds, underground services, surface material, etc.) | A fully resolved landscape plan with all requested details is provided. | FFLA Landscape plan |
| Concern is raised regarding the urban heat island effect and visual quality of the central laneway. Please provide more information regarding any landscaping treatment along the laneway (central laneway with garage access to apartments). | Planting strips have been introduced alongside and in front of car parks. The balance of the site provides good canopy cover. | FFLA Landscape plan |
| Infrastructure Drainage | | |
| In terms of the Stormwater Management Plan the information submitted is not satisfactory. This would need to be revised to comply with conditions stated above in regards to the site outfall drain below. | The Stormwater Management Plan has been updated to capture information requested, with an outfall drain added. | Stormwater Management Plan, FMG Engineering |
| An outfall drain is to be constructed through to the front portion of the site to be connected to Melbourne Water's drain via Council's pit. Alternatively existing Council drainage along the western boundary of the subject site to be upsized up to Melbourne Water's drain on Copernicus Way to the satisfaction of Council's Engineering Department. Melbourne Water's consent may be required. Plan checking and supervision fees will be applied for the outfall drain. | A new outfall drain within the easement along the western boundary of the supersite has been requested by council to service the proposed development and cater for 10-year ARI flows and flows within the subject development site will be conveyed to the new council drain without a detention system. The new outfall drain will connect directly to council stormwater pits located on Melbourne Water mains. | Stormwater Management Plan, FMG Engineering |
| Car spaces, access lanes & driveways must be maintained and kept available for these purposes at all times. | Comment acknowledged. No action required. | - |

| Feedback | Response | Reference |
|--|--|---|
| Protective kerbs (of a minimum height of 150 mm) must be provided to the satisfaction of the Responsible Authority to prevent damage to fences or landscaped areas and to control drainage flows. | This is a typical design requirement which will be captured at Detailed Design. | N/A |
| Vehicular crossing(s) must be constructed to the road to suit the proposed driveway(s) to the satisfaction of the Responsible Authority prior to any works being undertaken on the site. A Vehicle Crossing Permit must be obtained from Council's Engineering Department prior to any works commencing on the site. | This is a typical design requirement which will be captured at Detailed Design. | N/A |
| Access to the site and ancillary road works must be constructed in accordance with the requirements of the Responsible Authority. | A Framework Environmental Management Plan has been prepared by GHD, which outlines the requirement for a CEMP to be prepared by the appointed construction contractor in future. | FEMP, GHD |
| An on-site stormwater drainage retention/detention system must be designed by a qualified Engineer and installed on the subject land to the satisfaction of the Responsible Authority. The on-site retention/detention system is to be constructed before occupancy permit or statement of compliance whichever is the earliest. | This is a typical design requirement which will be captured at Detailed Design. | N/A |
| The entire development site must be connected to the existing underground drainage and sewerage systems to the satisfaction of the Responsible Authority. | Comment noted. The proposal shall be connected to the existing underground drainage and sewerage systems to the satisfaction of the Responsible Authority. | N/A |
| The crossover must be located and constructed to the satisfaction of the Responsible Authority in accordance with plans approved by the Responsible Authority. The plans submitted must show all services within the road reservation including power poles, drainage pits, Telstra pits, trees, road humps, bus stops and any other road infrastructure or asset that may hinder or impact on the operation of the crossover. | The site plan and civil sketch demonstrate how the crossover and all services will be accommodated. | TP05, FMG Engineering |
| The developer is to incorporate Water Sensitive Urban Design (WSUD) principles into the design. The design is to be certified by a competent Engineer and provided to the Responsible Authority. | This will feature in the detailed design as per stormwater management plan strategy. The stormwater management for the site is based on WSUD principles and will be consistent with Urban Stormwater Best Practice Environmental Management Guidelines (CSIRO 2006). | Stormwater Management Plan, FMG Engineering |
| The developer is to provide an Environmental Management Plan for the construction phases of the development works certified by | A Framework Environmental Management Plan has been prepared by GHD, which outlines the requirement for a CEMP to be | FEMP, GHD |

| Feedback | Response | Reference |
|---|--|---|
| a competent engineer and provided to the Responsible Authority. | prepared by the appointed construction contractor in future. | |
| The developer is required to construct an outfall drain from the property to connect with to the satisfaction of the Responsible Authority. Plans are to be prepared by a competent engineer and submitted to Council's Engineering department for approval. Works are to be undertaken in accordance with Council's standards. Checking and supervision fees will be required | A new outfall drain within the easement along the western boundary of the supersite has been requested by council to service the proposed development and cater for 10-year ARI flows and flows within the subject development site will be conveyed to the new council drain without a detention system. The new outfall drain will connect directly to council stormwater pits located on Melbourne Water mains. | Stormwater Management Plan, FMG Engineering |
| The developer is required to construct the laneway with an all-weather seal (either concrete or asphalt) including all related drainage works to the satisfaction of the Responsible Authority. | This is a typical design requirement which will be captured at Detailed Design. | |
| ESD | | |
| Keeping warm: While the current legal minimum requirement for thermal performance is 6 star NatHERS, and the best practice standard a minimum of 10% higher, a significantly higher rating of over 7.5 stars is proposed. Winter sun penetration is mixed depending on the orientation of each dwelling. No dwellings have primary living areas facing south. The heating efficiency is proposed to be best practice. | No action required. | N/A |
| Staying cool: The design's lack of effective shading will result in increased solar heat loads which is likely to increase reliance on air-conditioning. Cross-ventilation is variable, with some having poor air flow in living areas, and bedrooms (when used = doors closed) - there is none. Ceiling fans are noted but not discussed. | Secure lockable screens shall be provided to all openable external doors. Openable windows shall be able to be lockable open. Refer to updated architectural drawings showing notes for screen doors, lockable open windows and ceiling fans. | TP09-TP12 |
| Solar: Significant sized photovoltaic systems are proposed per dwelling. | Solar PV systems have been revised in size to 4kW (panel rating) as the Green Star Homes – Positive – Renewable Energy Pathway B - Modelled Sizing approach has been undertaken | TP06, EWE SMP |
| Water: Fixtures/fittings/appliances generally have best practice efficiency. The stormwater management is proposed to utilise rainwater tanks for with water reuse. Estate-wide stormwater measures will be left for the comment of Brimbank's Engineering Services. | No action required. | N/A |

| Feedback | Response | Reference |
|--|--|--------------------------------|
| Transport: Bicycle storage appears to be shown in some car bays, open to the weather and theft. Electric vehicle charging is proposed, however no details are provided. | Bike racks have been provided outside multi-dwelling buildings for visitors and racks indoors for level 1 residents under stairs and sheds for other dwellings have been highlighted. What will be provided is space for the EV charging unit, a dedicated AC circuit, cable routing and switchboard capacity. | TP09 - TP12, EWE SMP |
| Material flows: No improvements are noted for building materials impacts apart from related VOC/formaldehyde emissions. | No action required. | N/A |
| Waste: Waste/recycling facilities are not shown ready for to accommodate the 4 streams expansion (coming state-wide). A high-volume construction waste is to be recycled. | The 4 bin system has been added to the architectural plans. Refer to the updated architectural drawings | TP09-TP12 |
| Urban Ecology: The roof colour will increase Urban Heat Island Effect. The area of paving in rear courtyards could be reduced to limit UHI and runoff. Canopy trees and shading of paved areas is limited. No space has been allocated for productive gardens. | A medium roof colour will be specified for the project. Light colour concrete for paved areas and further landscaping shall reduce the urban heat island effect. Small planting, consistent with landscape capability will be planted between car bays. Large canopy trees are not feasible in this location. | TP09-TP12, FFLA Landscape plan |

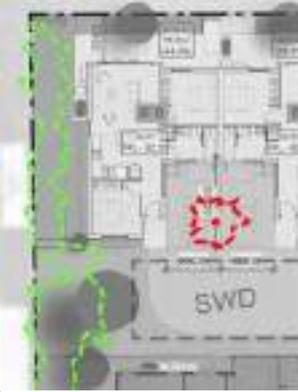
Table 3: Detailed Comments

| Comment | Response | Reference |
|---|--|---------------------------------------|
| Drawings | | |
| <p>The following are sought to be clearly included in the drawings:</p> <p>Plans – thermal performance rating, extent of double glazing, stormwater treatment devices (annotated with area/capacity/reuse), roof/awning line over, secure bicycle parking, segregated waste/recycling bins, a note stating all windows can be locked in open position, electric vehicle charging, any productive garden</p> | <p>Refer to updated architectural drawings noting that:</p> <ul style="list-style-type: none"> - A 7.5 Star NatHERS rating (average) to be achieved - Double glazing shall be specified throughout - Buffer strips and rainwater tanks labelled - Roof lines and shading structures drawn and labelled - Secure bicycle parking labelled - 4 bin system labelled - Notes stating screen doors and windows are lockable with nominated windows lockable open <p>Note that electric vehicle charging stations shall not be provided, only the infrastructure for future provision as per the Green Star Homes requirement for resilience. What will be provided is space for the EV charging unit, a dedicated AC circuit, cable routing and switchboard capacity</p> | <p>EWE SMP</p> <p>TP06, TP09-TP12</p> |

| Comment | Response | Reference |
|---|---|-----------|
| | Also note that a productive garden is not documented at this stage | |
| Elevations - Extent of shading (e.g. dash line showing the extent of pull-down awnings, etc.), and any enhanced daylight elements such as translucent panels in entry doors. | Refer to updated architectural drawings showing shading structures, no further daylight elements have been implemented | TP09-TP12 |
| Roof plan – Indicate photovoltaic arrays (annotate generation capacity) | Refer to updated architectural drawings noting 4kW PV system per dwelling | TP06 |
| Indoor Environment Quality | | |
| Natural ventilation – Council policy is to achieve thermal comfort levels with a reduced reliance on mechanical heating, ventilation and cooling systems. The SMP notes “All buildings shall be naturally ventilated with appropriate breeze paths”, however these need improvement: | Secure lockable screens shall be provided to all openable external doors. Openable windows shall be able to be lockable open. Refer to updated architectural drawings showing notes for screen doors, lockable open windows and ceiling fans. | TP09-TP12 |
| Operability – Show window and door sash operation using architectural drawings conventions. Consider awning sashes or weather protection for key sashes for all seasons/weather use. All sashes are sought to be able to locked open to increase likelihood of use when unattended, and allow ‘night-purging’ in warmer months. | Secure lockable screens shall be provided to all openable external doors. Openable windows shall be able to be lockable open. Refer to updated architectural drawings showing notes for screen doors, lockable open windows and ceiling fans. | TP09-TP12 |
| Encourage ventilation - Please ensure an operable window is provided in addition to any glazed door to all Living areas/bedrooms. Elevation B for Type A, and Type B show these – though the plans and other units are sought be similar. | Secure lockable screens shall be provided to all openable external doors. Openable windows shall be able to be lockable open. Refer to updated architectural drawings showing notes for screen doors, lockable open windows and ceiling fans. | TP09-TP12 |
| Dwelling Type A - Please indicate the bathroom windows on the plan that are shown on Elevation A | Refer to updated architectural drawings which include the window on both plan and elevation. | TP09 |
| Dwelling Type C – An operable fanlight/top light is sought over the front door (or a secure screen door) to allow effective cross-ventilation. | A secure screen door shall be provided, with a note added to plans. | TP10 |
| Daylight | | |
| Council policy is for natural daylight to be provided to reduce reliance on artificial lighting systems: Bathrooms - A skylight is sought where there are no windows. | Best practice daylight targets are being met in habitable spaces (living and bedroom areas). Skylights will not be added to bathrooms as they are non-habitable spaces | N/A |
| Dwelling Type C – The addition of translucent door panels will improve entry/hall daylight in that will otherwise be very dark. See | Best practice daylight targets are being met in habitable spaces (living and bedroom areas). Translucent door panels will not be added to entry / hall as they are non-habitable spaces | N/A |

| Comment | Response | Reference |
|--|---|-----------|
| suggestion for a top light over the entry door above. | | |
| Dwelling Type D – The addition of a window above the ground floor laundry cupboards is suggested to alleviate what will otherwise be very dark halls. | Best practice daylight targets are being met in habitable spaces (living and bedroom areas). Windows will not be added to floor laundry as they are non-habitable spaces | N/A |
| Energy Efficiency: | | |
| Shading – Page 14 of the SMP notes under Resilience “Ceiling fans, air conditioning, external shading and natural ventilation shall meet requirements of thermal resilience”, however effective shading is not evident. Effective external shading is sought which allows winter sun, but blocks summer sun. Clear, simple information is provided in the Information Box below. | External shading has been implemented in the design where feasible, no further shading has been added for this revision. Cooling loads and peak energy are being mitigated by high performance glazing, internal blinds, best practice insulation, glazing areas being reasonably sized (not extensive), solar PV and natural ventilation. We note again that the NatHERS average rating is well above 7.5 Stars with cooling loads generally being 50% or below the allowable NatHERS cooling load limit | N/A |
| Ceiling fans – Please show the fans noted in the SMP on the typical floor plan. | Ceiling fans are shown for all dwellings. Refer to updated architectural drawings | TP09-TP12 |
| Hot Water System – Please show the location of heat pump units on the plans | HWS is shown in each private open space or service area. Refer to updated architectural drawings | TP09-TP12 |
| Clothes drying – A retractable or fixed individual clotheslines is sought to be indicated on the plans for first floor apartments. Clotheslines should be adequate length/height to dry bed linen | Each dwelling is provided with a fold-down clothesline. Refer to updated architectural drawings | TP09-TP12 |
| Lighting – Daylight and movement sensors are sought to the shared corridors and stairwells in the Type D apartments. | A movement sensor will be included within the common area, as noted on plans. | TP11-TP12 |
| Building Materials: | | |
| Material choices – Consider committing to the incorporation of Supplementary Cementitious Materials (SCM's), and/or use of recycled aggregate. Consider a commitment to sourcing timber which is sourced from sustainably managed sources that hold third party verification is sought (note reference to FSC/PEFC 'Responsible Wood') | The project shall commit to 90% of timber in the project being either recycled, FSC or PEFC certified. This has been revised in this SMP Section 3.5 Due to tight project timeframe incorporation of Supplementary Cementitious Materials (SCM's), and/or use of recycled aggregate is not considered feasible for this project due to long curing times | EWE SMP |
| Transport: | | |
| Bicycle facilities – Council policy is to ensure that the built environment is designed to promote cycling as part of minimising car dependency. | Comment acknowledged. The road layout is conducive to low speeds. A shared path is provided along the south boundary, allowing for cycling connections to the east and west. | N/A |
| Visitor bicycle parking – A visitor bicycle rack is sought which is visually apparent on the | Bike racks have been provided outside multi-dwelling buildings for visitors. Refer to updated | TP11-TP12 |

| Comment | Response | Reference |
|---|--|---------------------|
| east and west side of the Type D apartment common corridor. | architectural drawings for these items and notes | |
| Resident bicycle parking – Bicycle racks are sought to be behind secure fence lines, and undercover wherever possible. | Bike racks have been provided outside multi-dwelling buildings for visitors, along with bike racks for each dwelling which have been located behind the fence line where feasible. Refer to updated architectural drawings for these items and notes | TP09-TP12 |
| Electric vehicles – Please detail the nature of electrical vehicle charging to be provided, and note on the drawings. | Note that electric vehicle charging stations shall not be provided, only the infrastructure for future provision as per the Green Star Homes requirement for resilience. What will be provided is space for the EV charging unit, a dedicated AC circuit, cable routing and switchboard capacity | TP09-TP12 |
| Waste Management: | | |
| <ul style="list-style-type: none"> Operational waste – A best practice standard is for recycling facilities to be provided that are at least as convenient for building occupants as general waste facilities. The Victorian Government has signalled a move to a state-wide ‘Four-bin waste and recycling system’ (separate glass, co-mingled recycling, organic matter, and landfill). | 4 bin system has been added to the architectural plans. Refer to the updated architectural drawings | TP09-TP12 |
| <ul style="list-style-type: none"> Bins – Please indicate the 4 distinct bins for the future 4 recycling /waste streams | 4 bin system has been added to the architectural plans. Refer to the updated architectural drawings | TP09-TP12 |
| Urban Ecology: | | |
| Vegetation – Council policy calls for development to protect and enhance biodiversity, encourage planting of indigenous vegetation, and productive gardens and minimise the urban heat island effect. | Some native and indigenous species are included within the landscape plan. Private open space areas are of a size capable of accommodating a productive garden if residents desire, as indicated. | FFLA Landscape plan |
| Food production – Consider clearly annotating a space for productive gardens on drawings. Soil testing for contaminants is encouraged. Gardening is shown to offer health benefits to residents: https://www.westernsydney.edu.au/newscentre/news_centre/story_archive/2018/gardening_improves_the_health_of_social_housing_residents_and_provides_a_sense_of_purpose | Private open space areas are of a size capable of accommodating a productive garden if residents desire, as indicated. | FFLA Landscape plan |
| Increase foliage – Additional trees and shrubs are sought where there are vacant unpaved areas. Consider canopy trees to shade the paved parking areas to mitigate Urban Heat Island effect. See the Figure below. (Figure 2) | Small planting, consistent with a capability will be planted between car bays. Concrete will be light colour SRI. Large canopy trees are not feasible in this location. Refer to updated landscape architect drawings and updated architectural drawings. | FFLA Landscape plan |

| Comment | Response | Reference |
|--|--|---------------------------------------|
|  | | |
| Urban Heat Island Effect – Council policy is to provide for the Urban Heat Island Effect to be minimised. Use of lighter colour roofing and/or paving can assist in alleviating the UHI Effect. | A medium colour is specified for the roofs, with solar arrays occupying large areas of roofing across the project. Light colour concrete for paved areas and further landscaping shall reduce the urban heat island effect. Small planting, consistent with landscape capability will be planted between car bays. | EWE SMP, FFLA Landscape plan, TP09-11 |
| Dark finishes - Page 14 of the SMP notes “Heat stress shall be met by either a site or community level by adhering to minimum solar reflective indexes for hard materials and incorporation of landscaping”, however the dark roof shade noted works against UHI mitigation. Please select a lighter colour. | A medium colour is specified for roofs. Light colour concrete is proposed for paved areas and further landscaping shall reduce the urban heat island effect. Small planting, consistent with landscape capability will be planted between car bays. | EWE SMP, TP05, TP09-11 |

3.2. COUNCIL MEETING – 19 OCTOBER 2021

The proposal was considered at a Council meeting on 19 October 2021 where it resolved that Council:

- a. Provides feedback to the proponent of the development at 21A Copernicus Way, Keilor Downs, to advise that Council has undertaken an assessment of the proposed development of the land for 47 social housing dwellings against Clause 52.20 of the Brimbank Planning Scheme and has found that the development complies with the requirements, subject to the recommended changes to the plans and associated documents at Attachment 5 to this report.
- b. Writes to the Minister for Energy, Environment and Climate Change, the Hon. Lily D’Ambrosio MP and the Minister for Planning, the Hon. Richard Wynne MP, to advise that Council has provided the above feedback and requests that the proponents are required to undertake additional consultation with the local community and extend the timeframe for providing comments.
- c. Determines to publicly release this report with attachments and Council’s resolutions at noon on Wednesday 20 October 2021.

The Council report also made a number of recommendations. These are outlined below:

Table 4 - Council Meeting Resolution (19 October 2021)

| Recommendation | Response | Reference |
|--|--|-----------|
| a) The 1.8 metre high fence abutting the eastern boundary to be noted as an acoustic fence designed by a suitably qualified acoustic engineer to ensure that | Plans have been updated to show a 1.8m acoustic fence along the east boundary. | TP05 |

| Recommendation | Response | Reference |
|--|--|----------------------------------|
| the private open space areas are protected from vehicle noise in the car park of the shopping centre. | | |
| b) Full details of the fences enclosing the secluded private open space of the ground floor dwellings on type D to include 25% openings/transparency. | Fencing has been updated to include visually permeable and non-permeable elements, with part of the fencing inset to facilitate planting to the street edge. | TP11-TP12 |
| c) A cross-section of the road/footpaths showing the proposed pits and underground services in relation to the proposed trees to ensure that sufficient trees can be accommodated. | The site has been designed with services offsets in line with Brimbank requirements. A cross section will be completed during Detailed Design. Refer Civil sketch. | FMG Engineering sketch |
| d) A minimum of 6 cubic metres of externally accessible storage to be provided for dwelling type A. | Shed capacity has been increased to 6 cubic metres for Type A. | TP09 |
| e) The bathroom windows shown on the elevations for dwelling type A are to be shown on the floor plans. | Bathroom windows are shown on both plan and elevation. | TP09 |
| f) Full details of the pocket park including any street furniture/equipment proposed. | Council standard seating is proposed within both pocket parks, along with lawn areas and some canopy trees. | FFLA Landscape Plan |
| g) Corner properties provided with splays in accordance with Council's subdivision standards and guidelines. | Splays have been incorporated to Type D dwellings, with slight adjustments across the site layout to accommodate these splays. | TP05, OneMileGrid report and FLP |
| h) Footpaths to be shown 90 degrees, across the extended driveways. | Footpaths have been altered to align 90 degrees across the north east and north west driveways which service several dwellings each. | TP05 |
| i) Radii on the inside of the bends to be increased. | Radii on the inside of bends is 3.5m and 7.5m on the outside of bends, allowing two B85 vehicles to pass simultaneously | TP05, OneMileGrid FLP |
| j) End car parking spaces adjacent to the footpath to provide buffer/separators between the car space and the footpath. | Planting strips have been added between footpaths and end car spaces. | TP05, OneMileGrid FLP |

| Recommendation | Response | Reference |
|--|--|---|
| k) Vehicle crossover splays shown to Council's current standards with 1200mm splays. | Vehicle crossover splays have been amended in accordance with Council Standard Drawings S320-S325. | TP05, OneMileGrid report and FLP |
| l) Provision of a detailed landscape plan that incorporates any changes required to the plans noted above, along with provision of additional landscaping and canopy trees along the central laneway. | A fully resolved landscape plan is provided which maximises canopy cover across the site. Due to space constraints, planting strips have been incorporated alongside and in front of car parks in the central laneway, as canopy trees are not feasible in this constrained space. | FFLA Landscape plan |
| m) Details of on-site stormwater drainage retention/detention system/s that are designed by a qualified Engineer. | Discussions with Council have confirmed the existing drain does not have capacity for additional flows, and as such a new outfall drain connecting to Council stormwater pits on Melbourne Water mains is proposed. | Stormwater Management Plan, FMG Engineering |
| n) Balconies to the upper level dwellings to be fully dimensioned, with the minimum dimensions to be 1.8m. | Dimensions have been added to architectural plans, with the balconies achieving a minimum dimensions of 2m. | TP11-TP12 |
| 2. A revised stormwater management plan that includes: | A revised stormwater management plan has been prepared in response to Council's queries. | Stormwater Management Plan, FMG Engineering |
| <p>a) An outfall drain constructed through to the front portion of the site to be connected to Melbourne Water's drain via Council's pit or:</p> <p>b) The existing Council drainage along the western boundary of the subject site to be upsized up to Melbourne Water's drain on Copernicus Way to the satisfaction of Council's Engineering Department.</p> | A new outfall drain will connect directly with Council stormwater pits located on Melbourne Water mains. | Stormwater Management Plan, FMG Engineering |
| <p>3. A revised Sustainability Management Plan to include the following:</p> <p>a) Thermal performance rating</p> <p>b) Extent of double glazing</p> <p>c) Stormwater treatment devices</p> | <p>NaTHERS thermal performance rating of 7.5 stars is achieved</p> <p>Double glazing is specified throughout the proposal</p> <p>Buffer landscape strips are proposed, along with rain water tanks for each single storey dwelling</p> <p>Visitor bicycle parking is provided outside multi-dwelling buildings</p> | EWE SMP, TP10, |

| Recommendation | Response | Reference |
|---|---|------------|
| <p>d) Visitor bicycle parking</p> <p>e) A note stating all windows can be locked in an open position</p> <p>f) A skylight for all bathrooms without windows</p> <p>g) For Dwelling Type C, an operable fanlight/top light over the front door (or a secure screen door) to allow effective cross-ventilation</p> <p>h) Details of shading devices for all habitable room windows facing the north, east and west.</p> | <p>Notes have been added to plans confirming all windows can be locked in an open position</p> <p>Good daylight outcomes have been achieved for all habitable rooms, as required. Bathrooms are not habitable rooms, and do not require a skylight</p> <p>Lockable screen doors are proposed to allow effective cross-ventilation, rather than fanlight windows</p> <p>Rooflines and awnings provide shading, as referenced</p> | |
| <p>4. Provision of a Waste Management Plan that provides details of regular garbage, recycling and green waste collection service to each of the dwellings on the subject land, including information regarding the type of bins, type and size of trucks, means of accessing bins and frequency of collection.</p> | <p>The internal road will become Council owned, facilitating kerbside waste collection via Council's existing residential waste collection system. Four bins are allocated to each dwelling.</p> | <p>N/A</p> |

3.3. COMMUNITY FEEDBACK

A total of 95 written submissions were received from the community. Whilst some submitters were in support of the proposal, the majority of submitters raised a range of concerns with the proposal and were not in support. A number of matters were also raised in an online petition, which have been included in the table below. At the time of finalising this report, the petition had 1380 signatures. Please find a link to the petition below:

<https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilor-downs>

Full transcripts (with names and identifying information redacted) are contained in Appendix C. The concerns raised within all submissions and the petition are set out in the table below, sorted into categories, along with the applicant's response to each.

Table 5 - Summary of Community Consultation

| Summary of Community Consultation | | |
|--|---|--------------------|
| COMMUNITY FEEDBACK | RESPONSE | CHANGE TO PROPOSAL |
| <u>Social Housing Use:</u> | | |
| The proposed social housing is not necessary, lots of other social housing nearby, in particular the Riverlee Development. | There is a demonstrable need for social / affordable housing in this area. | Nil |
| Wrong place for social housing, better locations for this development include empty apartments in the city instead. | There is a demonstrable need for social / affordable housing in this area. | Nil |
| Proximity of the proposal to a childcare centre | Childcare centres are generally located within residential areas, which is the case with the childcare centre near to the proposal. | Nil |
| Impact on property values | There are no planning controls within the planning scheme or Planning and Environment Act 1987 which require a responsible authority to determine the impacts of a proposal on land valuation. | Nil |
| The proposal will negatively alter the atmosphere and demographic balance of the neighbourhood | There are no planning controls within the planning scheme or <i>Planning and Environment Act 1987</i> which require a responsible authority to determine the impacts of a proposal on the demographic balance of a neighbourhood. | Nil |

Summary of Community Consultation

| | | |
|--|---|-----|
| | | |
| Concerns about community safety | Baptcare Affordable Housing (“BAH”) requires tenants to let their neighbours live in peace and does not tolerate anti-social behaviour. BAH will rent the dwellings under the Residential Tenancies Act . | Nil |
| Concern about the character of future occupants | BAH requires tenants to let their neighbours live in peace and does not tolerate anti-social behaviour. Should any problems with tenants arise, BAH and the Residential Tenancies Act have processes to deal with these problems. | Nil |
| Social housing should not be clustered in one area, instead should be spread out over the community. | The proposal seeks to provide much needed housing on one site, as is the case with many Clause 52.20 projects. | Nil |
| I would not have located to Keilor Downs if I knew this proposal was going ahead. | Landowners are able to change their views on how to best use and develop their landholdings. | Nil |
| <u>Built Form Feedback:</u> | | |
| The proposal is an overdevelopment of the site. | <p>The site is located within a Commercial 1 Zone with an approved Development Plan which contemplates built form between 3 and 6 stories in height. The proposed development is for single and double storey buildings only.</p> <p>The proposal provides a site coverage of 54%, with built form up to two storeys. These factors indicate that it is in keeping with the character of the surrounding area and within the comfortable capacity of the site to accommodate.</p> | Nil |

Summary of Community Consultation

| | | |
|--|--|------|
| High density housing is not appropriate for the area. | <p>The site is located within a Commercial 1 Zone with an approved Development Plan which contemplates built form between 3 and 6 stories in height.</p> <p>The proposal is for semi-detached one and two storey homes, in keeping with surrounding character.</p> | Nil |
| No green open space has been included for residents. | A pocket park and shared path are provided along the south boundary. | TP05 |
| Lack of connection or integration between the proposal and the approved retirement village to the north. | The approved residential aged care home has frontage to Copernicus Way, whilst the proposal is accessed from Thornhill Drive, in keeping with surrounding residential development. | Nil |

Transport Feedback:

| | | |
|--|--|-----|
| The proposal will cause traffic congestion, in particular in and around the shopping centre and along Thornhill Drive due to the dead-end street | OneMileGrid advises the proposal is likely to result in 282 vehicle movements per day, which in addition to the 291 vehicle movements on Thornhill Drive will still ensure Thornhill Drive movements are significantly below the design capacity of this Access Street Level 1 road – capable of up to 2000 movements per day. | Nil |
| The proposal is poorly located for those with disabilities due to not being close to a train line. | The proposal is located close to shops and amenities at Keilor Central. Planning policy encourages the development of medium density housing within the Keilor Downs Activity Centre. | Nil |

Services Feedback:

Summary of Community Consultation

| | | |
|---|---|------------------------|
| Inadequate Waste Management measures have been incorporated into the proposal | Each dwelling is provided with the 'four bin' system, in line with surrounding residential areas. | TP05 |
| The proposal lacks stormwater drainage and will result in localised flooding | The stormwater plan has been prepared which appropriately addresses drainage requirements. | FMG Engineering Report |
| <u>Parking Feedback:</u> | | |
| Insufficient carparking spaces have been provided for new residents, with 1 space per dwelling not enough | The proposal provides car parking in excess of requirements at Clause 52.20. | Nil |
| Lack of visitor parking spaces. This will cause further traffic/amenity issues. | No visitor car parking spaces are required under Clause 52.20. | Nil |
| <u>Miscellaneous Feedback:</u> | | |
| <p><u>Social infrastructure:</u></p> <p>Concerns were received about a lack of sufficient healthcare, policing numbers, and education infrastructure in Keilor Downs to service a new social housing proposal.</p> <p>In addition, many respondents expressed concern that some services are at capacity and will put more strain on childcare and mental health services.</p> | The approved DPO contemplates residential and mixed-use development of between 3-6 storeys on the site. The proposal contemplates a significantly lower density and therefore a lower residential population on the site, and will likely generate a lower demand on infrastructure and services when compared to the approved DPO. | Nil |
| <p><u>Baptcare Survey:</u></p> <p>Multiple respondents wished to view a copy of a survey carried out by Baptcare that indicated a demand for social housing from Keilor Downs residents.</p> | This survey did not form part of the consultation package and was an internal process carried out by Baptcare in identifying the site for social housing. | Nil |
| <p><u>Retirement Village Permit:</u></p> <p>Feedback was received expressing concern that the site was previously earmarked/had approval for a retirement village and the proposal now no longer accords with this.</p> | Planning permit for RV still exists, it forms a separate portion of the subject site, intended to be excised. | Nil |

Summary of Community Consultation

| | | |
|---|---|------------|
| <p><u>Community Consultation Methodology:</u></p> <p>Feedback was received on the community consultation process carried out by Urbis on behalf of Baptcare, which raised the following key issues:</p> <ul style="list-style-type: none"> ▪ Insufficient Notification was carried to residents, as the 150m radius not enough and many only made aware of the proposal by word of mouth ▪ The consultation process was not inclusive of Non-English Speaking Background (NESB) residents and was not accessible to elderly residents without internet ▪ Notification signage put up for the proposal was obscurely located, hidden away in a small area not frequented often by passers-by ▪ Only a single sign was put up ▪ No door knocking was conducted ▪ COVID-19 restrictions have impacted upon the consultation process ▪ Council was not involved in the application and was unable to respond effectively to concerns ▪ Further concerns were raised about Clause 52.20 and when the amendment was implemented/methodology behind it | <p>Consultation has occurred in line with Homes Victoria Consultation Guidelines and in accordance with the Consultation Strategy approved by Homes Victoria.</p> <p>Pursuant to Clause 52.20, DELWP is the responsible authority on behalf of the Minister for Energy, Environment and Climate Change</p> <p>The sign was located at the end of Thornhill Drive, where the proposal is proposed. The sign was relocated to Copernicus Way, away from the development site, by members of the public.</p> <p>Homes Victoria confirmed that consultation activities should occur online, due to Covid restrictions.</p> <p>Council have been consulted with and their feedback is addressed at Section 3.1 of this report.</p> | <p>Nil</p> |
| <p><u>COVID-19</u></p> <p>Feedback was received that raised concerns that a high-density proposal will cause a spike in COVID-19 cases within the Keilor Downs area, a suburb with a high number of positive cases as of late October 2021.</p> | <p>All homes provide good ventilation. There is no reason the proposal would have COVID-19 outcomes any different to surrounding existing residential areas.</p> | <p>Nil</p> |

Summary of Community Consultation

| | | |
|---|---|-------------|
| <p><u>Alternative Land Use</u></p> <p>Feedback was received that the land would be better utilised for a variety of alternative uses, including:</p> <ul style="list-style-type: none"> ▪ A nursing home or retirement village ▪ New Restaurants/cafes ▪ A Piazza or public plaza ▪ An extension to the shopping centre ▪ Retained as open space for residents | <p>Landowners can determine how to best use and develop their landholdings.</p> | <p>Nil.</p> |
| <p><u>Urbis Report:</u></p> <p>Multiple submissions were received that provided identical feedback on the Town Planning Report prepared by Urbis as part of the consultation package.</p> <p>This feedback argued that the proposal is non-compliant with State/Local policy, the purpose of the Commercial 1 Zone and with Clause 52.20.</p> | <p>The pro-forma submission raised a number of issues which are not considerations within the planning scheme, along with some inaccurate information regarding the zoning, State and Local policy.</p> <p>Refer to the Urbis Town Planning report.</p> | <p>Nil</p> |
| <p>A letter was received from owners of Keilor Downs SC giving in principle support to the proposal.</p> <p>Concern was raised about the equitable development of the eastern boundary of site.</p> | <p>Setbacks to the east boundary ensure future development to the east will not be unreasonably constrained by the proposal.</p> | <p>Nil</p> |
| <p>Three (3) responses were received that gave support for the development.</p> | <p>Response is noted</p> | <p>Nil</p> |
| <p>One response was received that was for a different social housing proposal.</p> | <p>The response was re-directed to the appropriate consultation link.</p> | <p>Nil</p> |

3.4. REFERRAL AUTHORITIES FEEDBACK

The application was not required to be referred to any external agencies.

3.5. RELOCATION OF SIGN

As indicated previously, a sign was erected on site for 21 days at the end of Thornhill Drive, adjacent to where the proposed access to the site is to be located. At an unknown point thereafter, the sign was relocated by an unknown party to a different location on the subject site, further to the north along the sidewalk along Copernicus Way. This fact was discovered by a representative of the applicant on Tuesday 26 October 2021 upon attempting to remove the sign from its original location at the closure of the consultation period.

The relocation of the sign may have cause additional confusion to local residents, as it's original placement along Thornhill Drive was consistent with the proposed location of the development, whilst the Copernicus Way location, adjacent to the location of the approved Retirement Village, may have given the erroneous impression that the proposal was replacing the Retirement Village.



Picture 1: Original placement of sign along Thornhill Drive

Source: *Planning Notices R Us*

Refer to Appendix G.



Picture 2: Relocated sign along Copernicus Way

Source: *Planning Notices R Us*

CONCLUSION

The consultation phase has been carried out in accordance with Homes Victoria Guidelines and with the Consultation Strategy submitted to and approved by Homes Victoria.

Baptcare Affordable Housing has considered all relevant matters raised by the community, Council, DELWP and Homes Victoria, and has made some adjustments to the proposal's design as outlined above. As outlined, Baptcare Affordable Housing determined that some / many matters raised were not relevant to the planning process or did not require a change to the proposal, with the rationale for each set out within this report.

In summary, the final proposal submitted in conjunction with this report has appropriately responded to and balanced the consultation feedback, the site context, the planning policy framework and the requirements of Clause 52.20 Victoria's Big Housing Build.

DISCLAIMER

This report is dated November 2021 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Baptistcare Affordable Housing (**Instructing Party**) for the purpose of Town Planning Application (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

In preparing this report, Urbis may rely on or refer to documents in a language other than English, which Urbis may arrange to be translated. Urbis is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this report being inaccurate or incomplete arising from such translations.

Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A

COUNCIL FEEDBACK

From: Dhiraj Joti <DhirajJ@brimbank.vic.gov.au>
Sent: Friday, 15 October 2021 11:13 AM
To: Phil Gleeson; Helen Allison
Subject: Internal referral comments (Big Build) - 21A Copernicus Way, Keilor Downs

Hi All,

I hope everything is well.

First of all apologies for the delay I was caught up with other matters over the last couple of days.

I have now received the following comments from the internal Departments and provide them for your information below.

Please note in relation to provisions of the Brimbank Planning Scheme, particularly Clause 53.20, Council will provide a formal response by **25th October 2021**.

If you have any queries please do not hesitate to contact me if you require any further information on 92494112.

Thank you and have a good weekend

Dhiraj

TRAFFIC

We have assessed the plans and have the following comments;

- Corner properties have not been provided with splays as per our sub-division standards and guidelines
- Footpaths do not align at 90 degrees, e.g. across the extended driveways
- There is no footpath connections from the blue properties to the pink properties in the middle
- Vehicle crossover splays have not been shown to Council current standards with 1200mm splays
- Radii on the inside of the bends seems too small and need to be increased
- FLP and detail design is required
- Vehicles parked off the laneway raise concerns as they their overhang can hit the dwellings, ideally there should be a kerb and channel setback enough to prevent the vehicle overhang from hitting the dwellings
- End car parking spaces adjacent to the footpath require a buffer/separator between the car space and the footpath.

Whilst a number of the items above may be resolved in the FLP, however they may change some of the property boundaries, therefore it may be better to resolve now

URBAN DESIGN

A number of UD's comments have been considered in the revised plan such as providing a 2.5 m wide path along the southern boundary.

- In reviewing the landscape concept plan and site plan, it seems that some of the locations of some of the proposed pits and underground services are too close to the proposed locations for some of the trees. It is required to provide further information and amend drawings to make sure that there is enough space for a tree without being interrupted by a pit or underground services.
- A cross-section is required to provide more info regarding trees and underground services, etc.

- The landscape plan is just a conceptual landscape plan. A detailed landscape plan is required (show all proposed species and location, trees, shrubs, dimensions of garden beds, underground services, surface material, etc.)
- Concern is raised regarding the urban heat island effect and visual quality of the central laneway. Please provide more information regarding any landscaping treatment along the laneway (central laneway with garage access to apartments).

INFRASTRUCTURE DRAINAGE

In terms of the Stormwater Management Plan the information submitted is not satisfactory. This would need to be revised to comply with conditions stated above in regards to the site outfall drain below. Please also see the other conditions that would be recommended if a permit was issued.

- An outfall drain is to be constructed through to the front portion of the site to be connected to Melbourne Water's drain via Council's pit. Alternatively existing Council drainage along the western boundary of the subject site to be upsized up to Melbourne Water's drain on Copernicus Way to the satisfaction of Council's Engineering Department. Melbourne Water's consent may be required. Plan checking and supervision fees will be applied for the outfall drain.
- Car spaces, access lanes & driveways must be maintained and kept available for these purposes at all times.
- Protective kerbs (of a minimum height of 150 mm) must be provided to the satisfaction of the Responsible Authority to prevent damage to fences or landscaped areas and to control drainage flows.
- Vehicular crossing(s) must be constructed to the road to suit the proposed driveway(s) to the satisfaction of the Responsible Authority prior to any works being undertaken on the site. A Vehicle Crossing Permit must be obtained from Council's Engineering Department prior to any works commencing on the site
- Access to the site and ancillary road works must be constructed in accordance with the requirements of the Responsible Authority.
- An on-site stormwater drainage retention/detention system must be designed by a qualified Engineer and installed on the subject land to the satisfaction of the Responsible Authority. The on-site retention/detention system is to be constructed before occupancy permit or statement of compliance whichever is the earliest.
- The entire development site must be connected to the existing underground drainage and sewerage systems to the satisfaction of the Responsible Authority.
- The crossover must be located and constructed to the satisfaction of the Responsible Authority in accordance with plans approved by the Responsible Authority. The plans submitted must show all services within the road reservation including power poles, drainage pits, Telstra pits, trees, road humps, bus stops and any other road infrastructure or asset that may hinder or impact on the operation of the crossover.
- The developer is to incorporate Water Sensitive Urban Design (WSUD) principles into the design. The design is to be certified by a competent Engineer and provided to the Responsible Authority
- The developer is to provide an Environmental Management Plan for the construction phases of the development works certified by a competent engineer and provided to the Responsible Authority
- The developer is required to construct an outfall drain from the property to connect with to the satisfaction of the Responsible Authority. Plans are to be prepared by a competent engineer and submitted to Council's Engineering department for approval. Works are to be undertaken in accordance with Council's standards. Checking and supervision fees will be required
- The developer is required to construct the laneway with an all-weather seal (either concrete or asphalt) including all related drainage works to the satisfaction of the Responsible Authority.

ESD

The requirements of this pathway noted in the SMP are not all apparent in the other documents.

- **Keeping warm:** While the current legal minimum requirement for thermal performance is 6 star NatHERS, and the best practice standard a minimum of 10% higher, a significantly higher rating of over 7.5 stars is proposed. Winter sun penetration is mixed depending on the orientation of each dwelling. No dwellings have primary living areas facing south. The heating efficiency is proposed to be best practice.
- **Staying cool:** The design's lack of effective shading will result in increased solar heat loads which is likely to increase reliance on air-conditioning. Cross-ventilation is variable, with some having poor air flow in living areas, and bedrooms (when used = doors closed) - there is none. Ceiling fans are noted but not discussed.

- **Solar:** Significant sized photovoltaic systems are proposed per dwelling.
- **Water:** Fixtures/fittings/appliances generally have best practice efficiency. The stormwater management is proposed to utilise rainwater tanks for with water reuse. Estate-wide stormwater measures will be left for the comment of Brimbank’s Engineering Services.
- **Transport:** Bicycle storage appears to be shown in some car bays, open to the weather and theft. Electric vehicle charging is proposed, however no details are provided.
- **Material flows:** No improvements are noted for building materials impacts apart from related VOC/formaldehyde emissions.
- **Waste:** Waste/recycling facilities are not shown ready for to accommodate the 4 streams expansion (coming state-wide). A high-volume construction waste is to be recycled.
- **Urban Ecology:** The roof colour will increase Urban Heat Island Effect. The area of paving in rear courtyards could be reduced to limit UHI and runoff. Canopy trees and shading of paved areas is limited. No space has been allocated for productive gardens.

DETAILED COMMENTS

General

- **Drawings** – The following are sought to be clearly included in the drawings:
 - Plans – thermal performance rating, extent of double glazing, stormwater treatment devices (annotated with area/capacity/reuse), roof/awning line over, secure bicycle parking, segregated waste/recycling bins, a note stating all windows can be locked in open position, electric vehicle charging, any productive garden
 - Elevations - Extent of shading (e.g. dash line showing the extent of pull-down awnings, etc.), and any enhanced daylight elements such as translucent panels in entry doors.
 - Roof plan – Indicate photovoltaic arrays (annotate generation capacity)

Indoor Environment Quality

- **Natural ventilation** – Council policy is to achieve thermal comfort levels with a reduced reliance on mechanical heating, ventilation and cooling systems. The SMP notes “All buildings shall be naturally ventilated with appropriate breeze paths”, however these need improvement.
 - Operability – Show window and door sash operation using architectural drawings conventions. Consider awning sashes or weather protection for key sashes for all seasons/weather use. All sashes are sought to be able to locked open to increase likelihood of use when unattended, and allow ‘night-purging’ in warmer months.
 - Encourage ventilation - Please ensure an operable window is provided in addition to any glazed door to all Living areas/bedrooms. Elevation B for Type A, and Type B show these – though the plans and other units are sought be similar.
 - Dwelling Type A - Please indicate the bathroom windows on the plan that are shown on Elevation A
 - Dwelling Type C – An operable fanlight/top light is sought over the front door (or a secure screen door) to allow effective cross-ventilation.
- **Daylight** – Council policy is for natural daylight to be provided to reduce reliance on artificial lighting systems.
 - Bathrooms - A skylight is sought where there are no windows.
 - Dwelling Type C – The addition of translucent door panels will improve entry/hall daylight in that will otherwise be very dark. See suggestion for a top light over the entry door above.
 - Dwelling Type D – The addition of a window above the ground floor laundry cupboards is suggested to alleviate what will otherwise be very dark halls.

Energy Efficiency

- **Shading** – Page 14 of the SMP notes under Resilience “Ceiling fans, air conditioning, external shading and natural ventilation shall meet requirements of thermal resilience”, however effective shading is not evident. Effective external shading is sought which allows winter sun, but blocks summer sun. Clear, simple information is provided in the Information Box below.

- **Ceiling fans** – Please show the fans noted in the SMP on the typical floor plan.
- **Hot Water System** – Please show the location of heat pump units on the plans.
- **Clothes drying** – A retractable or fixed individual clotheslines is sought to be indicated on the plans for first floor apartments. Clotheslines should be adequate length/height to dry bed linen.
- **Lighting** – Daylight and movement sensors are sought to the shared corridors and stairwells in the Type D apartments.

Building Materials

- **Material choices** – Consider committing to the incorporation of Supplementary Cementitious Materials (SCM's), and/or use of recycled aggregate. Consider a commitment to sourcing timber which is sourced from sustainably managed sources that hold third party verification is sought (note reference to FSC/PEFC 'Responsible Wood')

Transport

- **Bicycle facilities** – Council policy is to ensure that the built environment is designed to promote cycling as part of minimising car dependency.
 - Visitor bicycle parking – A visitor bicycle rack is sought which is visually apparent on the east and west side of the Type D apartment common corridor.
 - Resident bicycle parking – Bicycle racks are sought to be behind secure fence lines, and undercover wherever possible.
- **Electric vehicles** – Please detail the nature of electrical vehicle charging to be provided, and note on the drawings.

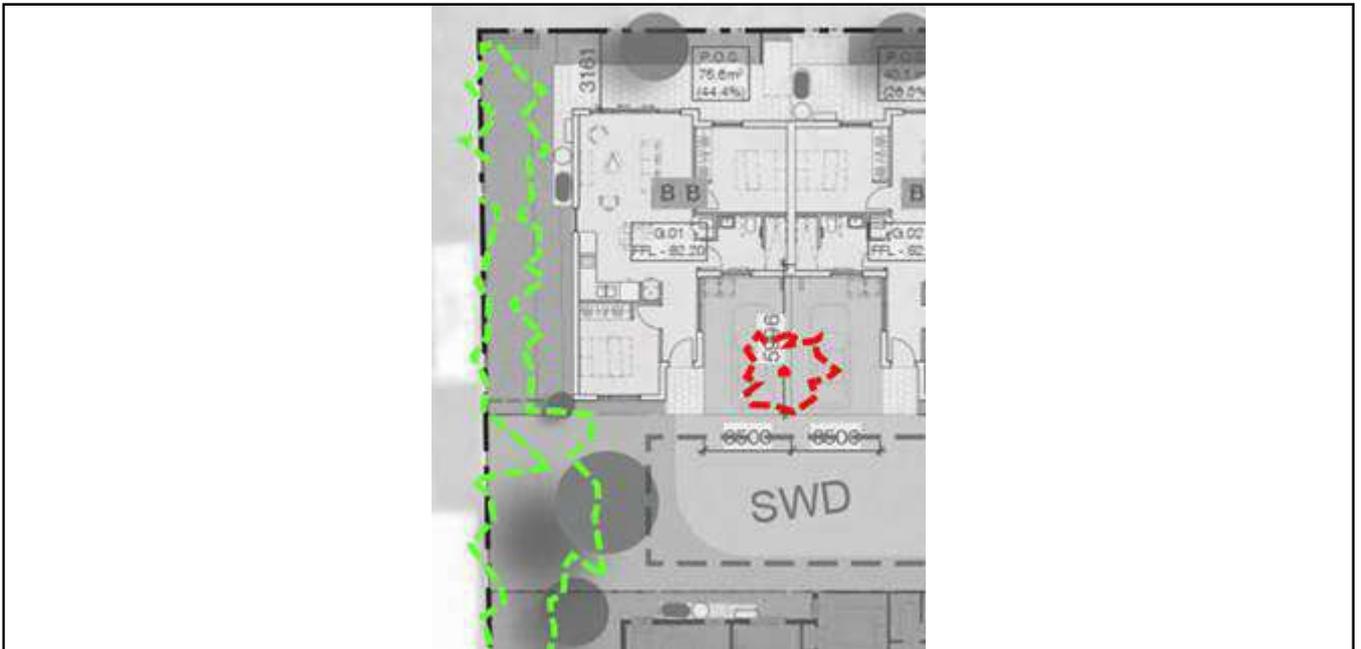
Waste Management

- **Operational waste** – A best practice standard is for recycling facilities to be provided that are at least as convenient for building occupants as general waste facilities. The Victorian Government has signalled a move to a state-wide 'Four-bin waste and recycling system' (separate glass, co-mingled recycling, organic matter, and landfill).
 - Bins – Please indicate the 4 distinct bins for the future 4 recycling /waste streams

Urban ecology

- **Vegetation** – Council policy calls for development to protect and enhance biodiversity, encourage planting of indigenous vegetation, and productive gardens and minimise the urban heat island effect.
 - Food production – Consider clearly annotating a space for productive gardens on drawings. Soil testing for contaminants is encouraged. Gardening is shown to offer health benefits to residents: https://www.westernsydney.edu.au/newscentre/news_centre/story_archive/2018/gardening_improves_the_health_of_social_housing_residents_and_provides_a_sense_of_purpose
 - Increase foliage – Additional trees and shrubs are sought were there are vacant unpaved areas. Consider canopy trees to shade the paved parking areas to mitigate Urban Heat Island effect. See the Figure below.

Figure 1: Increase canopy is sought for open areas that are not paved (e.g. green zone). Consider canopy trees between car bays to shade this paved areas (e.g. see red line).



- **Urban Heat Island Effect** – Council policy is to provide is for the Urban Heat Island Effect to be minimised. Use of lighter colour roofing and/or paving can assist in alleviating the UHI Effect.
 - Dark finishes - Page 14 of the SMP notes “Heat stress shall be met by either a site or community level by adhering to minimum solar reflective indexes for hard materials and incorporation of landscaping”, however the dark roof shade noted works against UHI mitigation. Please select a lighter colour.

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APPENDIX B

**COUNCIL MEETING AGENDA AND
RESOLUTION**

| | |
|---|---|
| 15.1 | Proposed Social Housing Development at 21A Copernicus Way, Keilor Downs |
| Directorate | City Development |
| Director | Kelvin Walsh |
| Manager | Kristen Gilbert |
| Attachment(s) | <ol style="list-style-type: none"> 1. Zoning Map [15.1.1 - 1 page] 2. Aerial Photo [15.1.2 - 1 page] 3. Plans for consideration [15.1.3 - 19 pages] 4. Detailed assessment [15.1.4 - 29 pages] 5. Recommended changes to plans and documentation [15.1.5 - 2 pages] |
| Purpose | For decision |
| To provide Council with an assessment of a proposed social housing development at 21A Copernicus Way, Keilor Downs, against the provisions of the Brimbank Planning Scheme. | |

Legislation/Council Plan/Policy Context

This report complies with the *Planning and Environment Act 1987* (the Act), the *Local Government Act 1989* and the Brimbank Planning Scheme (Planning Scheme).

Council officers contributing to the preparation and approval of this report, have no conflicts of interests to declare.

Issue For Consideration

For Council to consider an assessment of a proposal for 47 social housing dwellings at 21A Copernicus Way, Keilor Downs (the site), against the Planning Scheme.

Background

In December 2020 the Minister for Planning introduced Clause 52.20 *Victoria's Big Housing Build* into all planning schemes across Victoria under Amendment VC190 to streamline the planning process and support economic recovery through the creation of jobs, and to ensure the rapid delivery of social and affordable housing. Amendment VC190 also made the Minister for Energy, Environment and Climate Change the responsible authority for matters determined under Clause 52.20.

Council has been notified of a proposal under Victoria's Big Housing Build for 47 dwellings to be provided as social housing by Baptistcare Affordable Housing at 21A Copernicus Way, Keilor Downs (refer to **Attachments 1, 2 and 3**). The dwellings are a combination of single storey and double storey built form, with the single storey form around the perimeter of the site and the double storey form central to the site. Thirty-seven one-bedroom dwellings are proposed along with six two-bedroom dwellings and four three-bedroom dwellings. Vehicle access to the development would be from the end of Thornhill Drive, with pedestrian access made available along the southern boundary of the site from Thornhill Drive to the adjoining shopping centre.

Consultation

One of the requirements before an application is lodged for consideration by the Minister for Energy, Environment and Climate Change is that the proponent must undertake public consultation as well as consultation with the relevant municipal council. The proponent has provided Council with details of the proposal including plans, a written submission and accompanying reports relating to traffic, stormwater management and

environmentally sustainable design. A letter and a copy of the plans was also sent to property owners and occupiers within 150m of the site on 1 October 2021.

Feedback is required to be provided to the proponent by 25 October 2021. The proponent is then required to prepare a consultation report that outlines the submissions raised and the proposed response to the submissions. This report must be submitted to the Minister for Energy, Environment and Climate Change to be considered in their assessment of the proposal.

Despite the consultation being undertaken by the proponent, a number of residents have contacted Council raising concerns about the proposal, and in particular the density, traffic impacts and concerns about the use for social housing.

Analysis

The subject site is located at the southern end of the land known as 21A Copernicus Way, Keilor Downs, and at the eastern end of Thornhill Drive. Immediately to the south is a childcare centre, the Keilor Downs Community Centre and the new Brimbank Aquatic and Wellness Centre which is currently under construction, to the east is the Keilor Central shopping centre and to the west is an established residential estate. The site is currently undeveloped but includes an informal path diagonally across it providing access to the shopping centre. A planning permit was issued in October 2020 for the northern section of the land to be developed and used for a residential aged care facility. All vehicle access to that development would be off Copernicus Way.

The proposed development needs to be considered against Clause 52.20 of the Planning Scheme. The purpose of Clause 52.20 *Victoria's Big Housing Build* is:

- *To facilitate the use and development of land for housing projects funded by Victoria's Big Housing Build program.*
- *To ensure that development does not unreasonably impact on the amenity of adjoining dwellings.*

Clause 52.20-6 sets out development standards for dwellings and buildings that effectively override the majority of other provisions within the Planning Scheme. A detailed assessment of the proposal has been undertaken against Clause 52.20-6 and it shows that the proposal achieves a very high level of compliance with these provisions (refer to **Attachment 4**). Where compliance has not been achieved, it is considered that some minor changes could be made to bring the development into compliance and these recommended changes are listed in **Attachment 5**.

Concerns have been raised by some local residents that the site is not a suitable location for social housing and that they are concerned that the behaviour of future residents will impact on the amenity and safety of the area. Whilst Council does not currently have an adopted policy on social housing, the Brimbank Housing Strategy *Home and Housed*, which was adopted by Council in 2014, includes a section on social housing.

Social housing is noted as including indigenous, public and community housing. The current proposal would fall under the definition of community housing which is "*housing delivered through a partnership between State Government and registered housing associations or housing providers. It is usually provided to individuals and families on low to moderate incomes.*"

The Housing Strategy outlines the following ways in which Council will support social housing:

- *Ensure the existing social housing is safeguarded while also encouraging further provision.*
- *Talk to the Office of Housing about the maintenance or replacement of residential buildings in poor condition.*
- *Facilitate the provision of indigenous, public and community housing.*

The strategy also notes that housing affordability is not just about the price of housing but also its location. The subject site is located adjacent to a large shopping centre that includes a medical centre and a variety of food retailers and other services, north of the future Aquatic and Wellness Centre which will provide a variety of health and wellbeing services, and within walking distance of bus and train services. These all make the site a suitable location for a social housing development.

Resource And Risk Implications

Resource requirements can be met within the Annual Budget 2021/2022.

There are no Community, Environmental, Financial, Regulatory or Safety risks identified.

Officer Recommendation

That Council:

- Provides feedback to the proponent of the development at 21A Copernicus Way, Keilor Downs, to advise that Council has undertaken an assessment of the proposed development of the land for 47 social housing dwellings against Clause 52.20 of the Brimbank Planning Scheme and has found that the development complies with the requirements, subject to the recommended changes to the plans and associated documents at Attachment 5 to this report.**
- Writes to the Minister for Energy, Environment and Climate Change, the Hon. Lily D'Ambrosio MP and the Minister for Planning, the Hon. Richard Wynne MP, to advise that Council has provided the above feedback.**
- Determines to publicly release this report with attachments and Council's resolutions at noon on Wednesday 20 October 2021.**
- Notes that the global, Federal and State response to the COVID-19 pandemic may change the conditions encountered and information reviewed at the date of the preparation of this report.**
- Authorises officers to redirect resources in order to give effect to the recommendations in this report if any such redirection is reasonably required as a result of a change caused by the COVID-19 pandemic, and in accordance with any delegations made by Council in effect at the time.**

Resolution

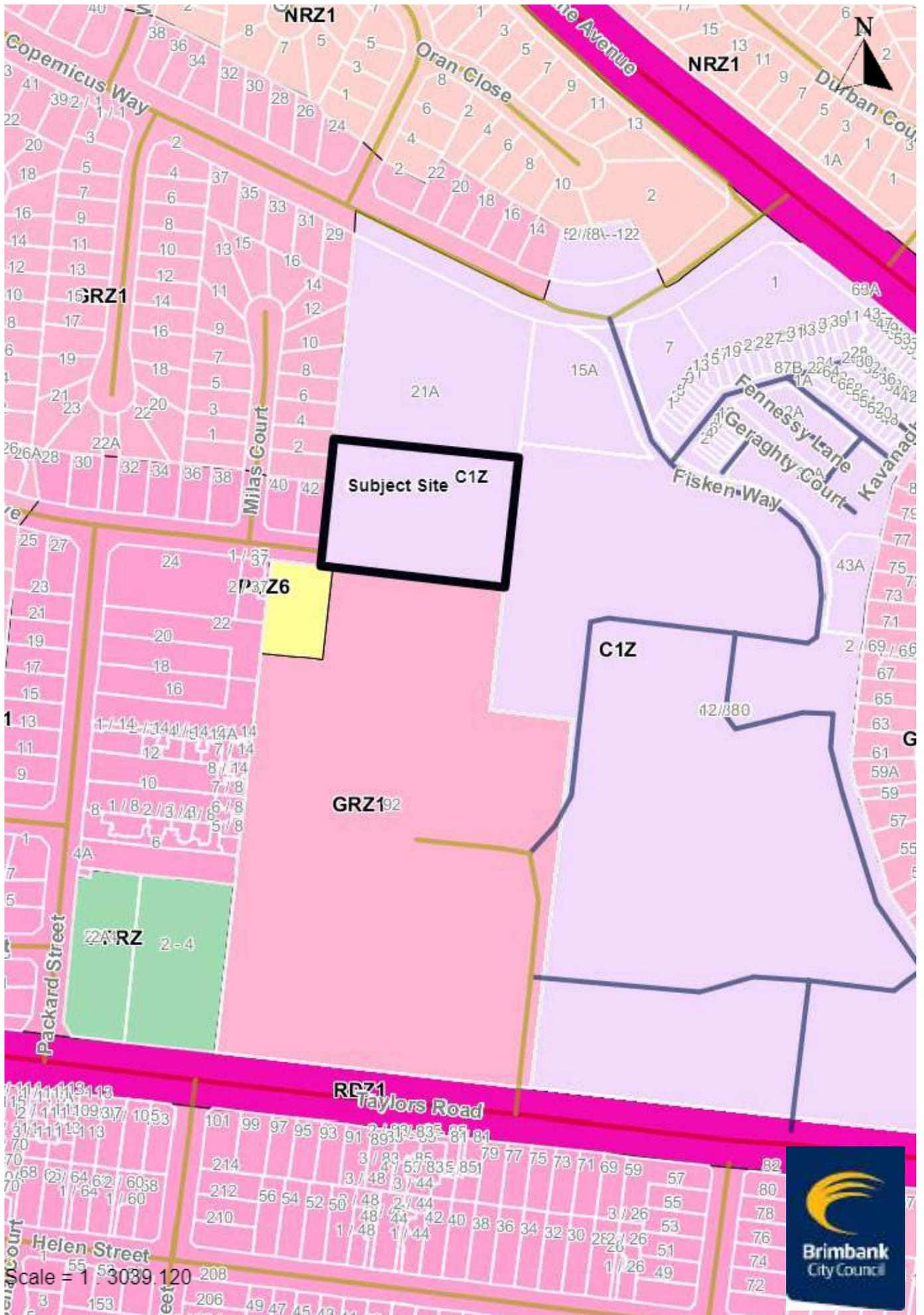
Moved Cr Bruce Lancashire/Seconded Cr Trung Luu

That Council:

- Provides feedback to the proponent of the development at 21A Copernicus Way, Keilor Downs, to advise that Council has undertaken an assessment of the proposed development of the land for 47 social housing dwellings against Clause 52.20 of the Brimbank Planning Scheme and has found that the development complies with the requirements, subject to the recommended changes to the plans and associated documents at Attachment 5 to this report.**

- b. Writes to the Minister for Energy, Environment and Climate Change, the Hon. Lily D'Ambrosio MP and the Minister for Planning, the Hon. Richard Wynne MP, to advise that Council has provided the above feedback and requests that the proponents are required to undertake additional consultation with the local community and extend the timeframe for providing comments.**
- c. Determines to publicly release this report with attachments and Council's resolutions at noon on Wednesday 20 October 2021.**
- d. Notes that the global, Federal and State response to the COVID-19 pandemic may change the conditions encountered and information reviewed at the date of the preparation of this report.**
- e. Authorises officers to redirect resources in order to give effect to the recommendations in this report if any such redirection is reasonably required as a result of a change caused by the COVID-19 pandemic, and in accordance with any delegations made by Council in effect at the time.**

CARRIED





Attachment 15.1.2



Drawing Schedule

Architectural

Town Planning

| | |
|------|---|
| TP00 | Cover Sheet |
| TP01 | Site Context |
| TP02 | Existing Conditions |
| TP03 | Design Response Plan |
| TP04 | Site Plan |
| TP05 | Overall Floor Plan Ground |
| TP06 | Overall Floor Plan First Floor |
| TP07 | Existing Street Elevations & Sections |
| TP08 | Proposed Street Elevations & Sections |
| TP09 | Single Storey Unit Type A |
| TP10 | Single Storey Unit Type B |
| TP11 | Single Storey Unit Type C |
| TP12 | Walk Up Unit Type D |
| TP13 | Shadow Diagrams - Sheet 1 of 2 |
| TP14 | Shadow Diagrams - Sheet 2 of 2 |
| TP15 | Materials Boards & Precedents |
| TP16 | Artist Impression 1 - Single Storey Units |
| TP17 | Artist Impression 2 - Single Storey Units |
| TP18 | Artist Impression 3 - Walk Up Units |

Baptcare Housing Development - Keilor Downs

Copernicus Way, Keilor Downs VIC 3038

210016



Site and Context Description

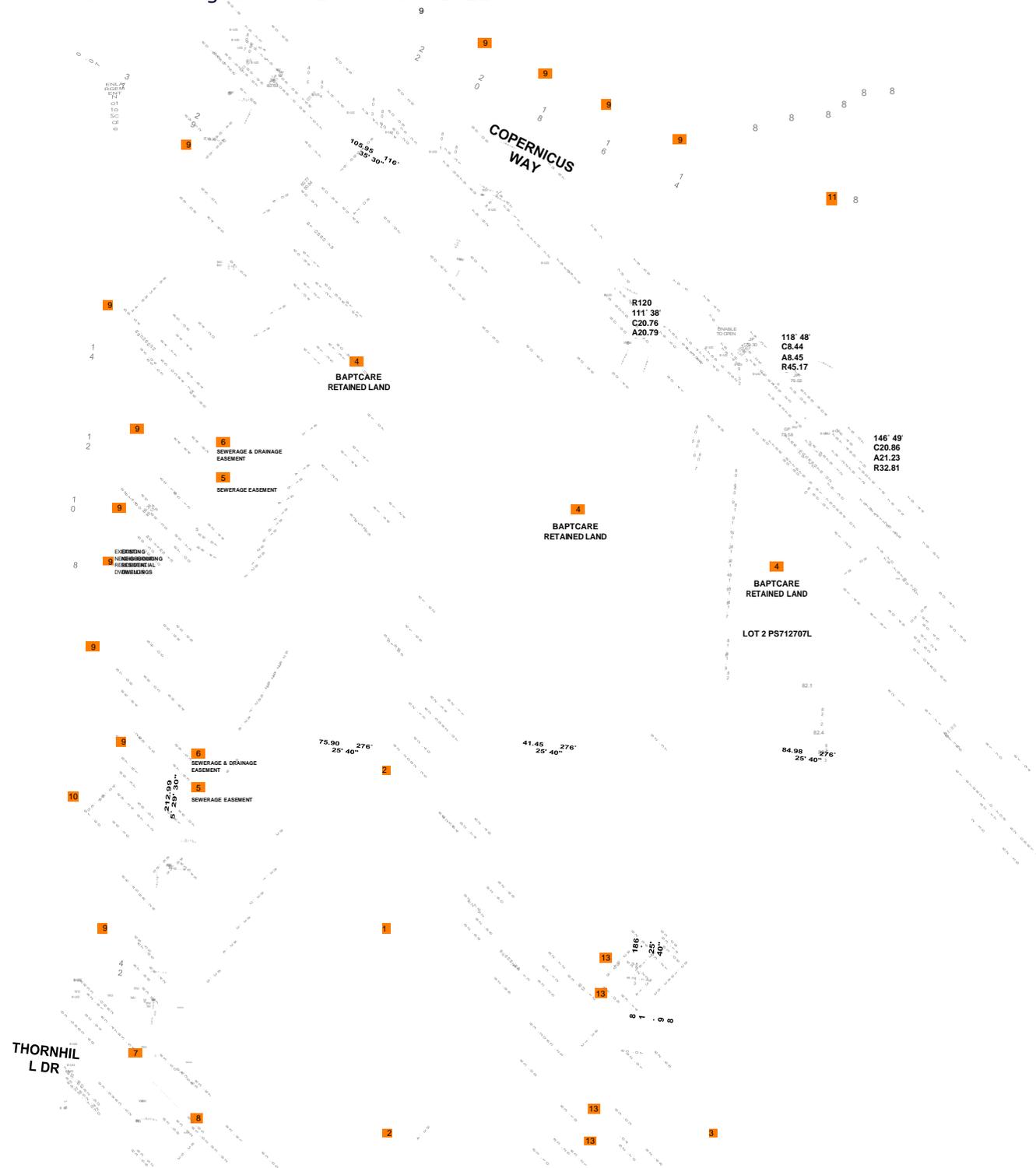
- 1 THE SUBJECT SITE IS LOCATED AT 21 COPERNICUS WAY, KEILOR DOWNS VIC 3038 AND HAS A TOTAL SITE AREA OF 6666 SQM
- 2 THE SITE FALLS CONSISTENTLY FROM SOUTH TO NORTH
- 3 EXISTING KEILOR DOWNS CENTRAL SHOPPING CENTRE & CARPARK
- 4 VACANT SITE
- 5 EXISTING SEWER EASEMENT
- 6 EXISTING SEWER & DRAINAGE EASEMENT
- 7 ENTRY TO SITE FROM THORNHILL DRIVE
- 8 EXISTING ENTRY TO THORNHILL DRIVE KINDERGARTEN AND CHILDRENS CENTRE
- 9 EXISTING SINGLE STOREY DWELLING
- 10 EXISTING DOUBLE STOREY DWELLING
- 11 RETAIL STRIP
- 12 PEDESTRIAN MADE DIRT TRACK TO SHOPPING CENTRE CARPARK
- 13 EXISTING TREES TO BE REMOVED IN ACCORDANCE WITH NATIVE VEGETATION REMOVAL PERMIT

Site Context Information

SUBJECT SITE AREA 9,666sq

Legend

- E TITLE BOUNDARY
- ELECTRICAL POLE
- G GAS VALVE
- T TELCOM PIT
- SP STORM DRAIN
- SW SEWER PIT
- US UNCLASSIFIED SERVICE
- H HYDRANT
- TRAFFIC DIRECTION



Attachment 15.1.3

1/3, Melbourne Connect
700 Swanston Street
Carlton VIC 3053

3/78 Campbell Street
Surry Hills NSW 2010
Telephone (02) 9221 9200

Telephone (03) 9419 4340
Email studio@chc.com.au
www.chc.com.au

Email studio@chc.com.au
www.chc.com.au

Baptcare Housing Development - Keilor Downs

Existing Conditions

Copernicus Way, Keilor Downs VIC 3038



TOWN PLANNING

23.09.2021

210016/TP02







Design Response 10 of 56

| | |
|---|----------------|
| SITE AREA | 9065 SQM |
| OPEN AREAS | 5167.20 SQM |
| ROAD | 2320 SQM |
| CURBS & CROSSEOVERS | 290 SQM |
| DWELLINGS | 2800 SQM |
| SITE COVERAGE | 6210 SQM (64%) |
| TOTAL OF DWELLINGS, ROAD, CURBS & CROSSEOVERS | |
| GARDEN AREA | 2698 SQM (29%) |
| TOTAL OF FDS AND OPEN AREAS | |
| PERMEABILITY | 4365 SQM (48%) |

- 1** EXISTING KEILOR DOWNS SHOPPING CENTRE CARPARK.
- A** PROPOSED SINGLE STOREY HOUSE, COMPRISING OF 1 BEDROOM (TYPE A).
- B** PROPOSED SINGLE STOREY HOUSE, COMPRISING OF 2 BEDROOMS (TYPE B).
- C** PROPOSED VOLUME BUILD SINGLE STOREY HOUSE, COMPRISING OF 3 BEDROOMS (TYPE C).
- D** PROPOSED TWO STOREY UNIT, COMPRISING OF 2 UNITS (1 BEDROOM EACH TYPE D).
- 2** VISUAL LINK AND PEDESTRIAN ACCESS TO KEILOR DOWNS SHOPPING CENTRE.
- 3** EXISTING RESIDENTIAL.
- 4** PROPOSED DWELLING SETBACK APPROX. 5.0m FROM BOUNDARY.
- 5** PROPOSED DWELLING SETBACK MINIMUM 2.7m FROM NEIGHBOURING BOUNDARY.
- 6** PROPOSED DWELLING SETBACK 3.3m FROM NEIGHBOURING BOUNDARY.
- 7** PROPOSED NEW CONCRETE CROSSEOVER TO SUBJECT SITE FROM THORNHILL DRIVE. ASSOCIATED PATHS AS PER TRAFFIC ENGINEER'S DOCUMENTATION.
- 8** EXISTING ENTRY TO THORNHILL DRIVE KINDERGARTEN AND CHILDRENS CENTRE.
- 9** PEDESTRIAN CROSSING AND SPEED HUMPS
- 10** UPPER FLOOR WINDOWS AND BALCONIES WILL BE SCREENED TO 1.7M WHERE WITHIN 9M OF ADJOINING FDS OR HABITABLE SPACE TO PREVENT OVERLOOKING OF THE PRIVATE OPEN SPACE OF NEIGHBOURING PROPERTIES.

Legend

--- TITLE BOUNDARY



SITE AREA
9565 SQM

SITE COVERAGE
5210 SQM (54%)

SINGLE STOREY HOUSES

| | |
|---|----------------|
| A TYPE A 1 BED, 1 BATH, SINGLE GARAGE | 13 UNITS (28%) |
| B TYPE B 2 BED, 2 BATH, SINGLE GARAGE | 6 UNITS (12%) |
| C TYPE C (VOLUARE BUILDER) 3 BED, 2 BATH, SINGLE GARAGE | 4 UNITS (8%) |

TWO STOREY HOUSES

| | |
|---|----------------|
| D TYPE D 1 BED, 1 BATH, SINGLE GARAGE | 24 UNITS (52%) |
|---|----------------|

TOTAL 47 UNITS

- 1 BEDROOM (80%)
- 2 BEDROOM (12%)
- 3 BEDROOM (8%)

Legend

NEW TREES

NOTE: SUFFICIENT OPEN AREAS TO MEET DEEP SOIL PLANTING REQUIREMENTS.

TITLE BOUNDARY

700 Swarston Street
Carlton VIC 3053

Telephone (03) 9419 4340
Email studio@chc.com.au
www.chc.com.au

Telephone (02) 9221 9200
Surrey Hills NSW 2010
Copernicus Way, Kailor Downs VIC 3038



210016/1P04

A1





Attachment 15.1.3

Baptcare Housing Development - Keilor Downs

Overall Floor Plan Ground Downs

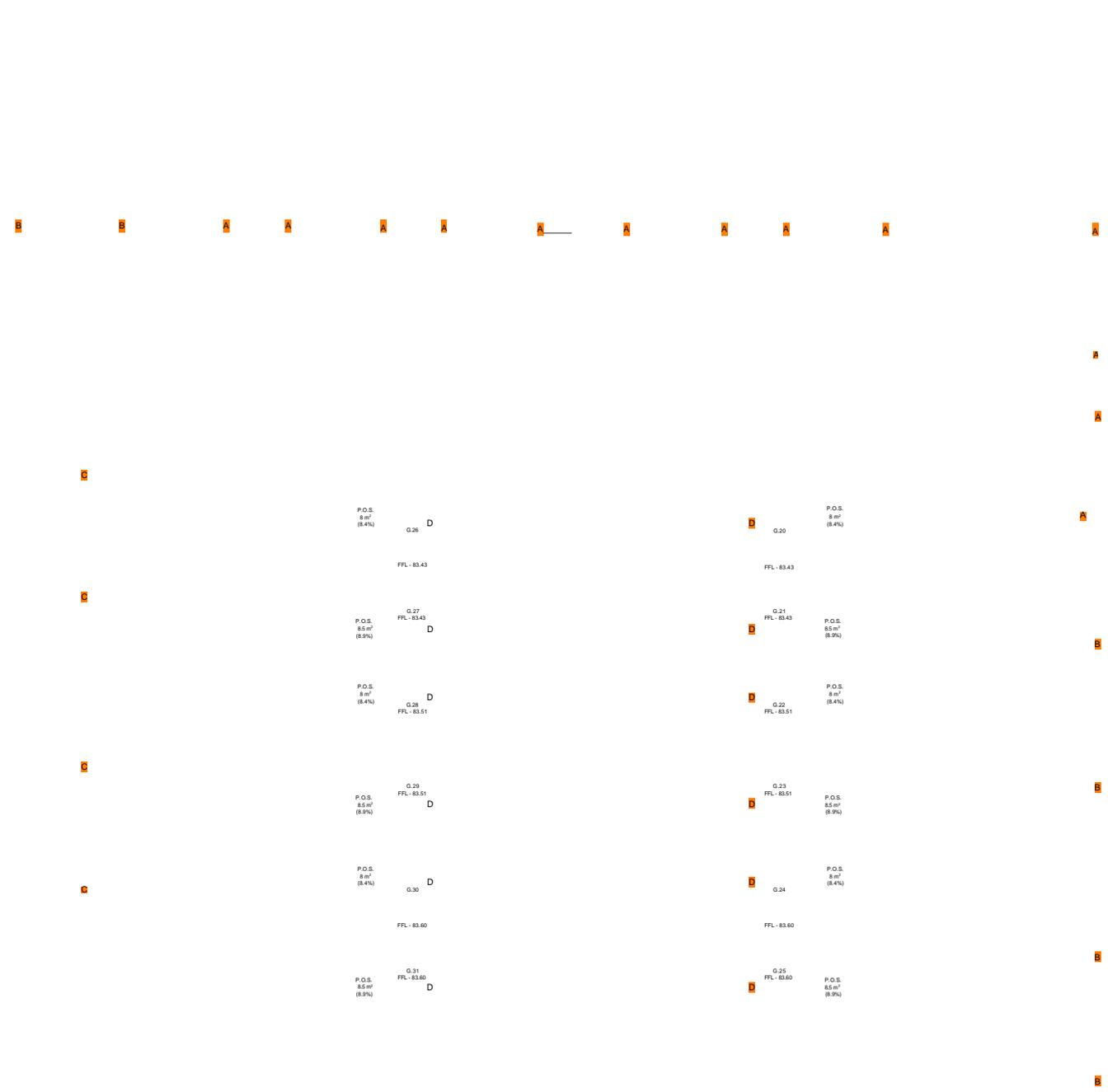
140 Melbourne Central
 27th Floor
 City Centre VIC 3000
 Telephone (03) 9419 4340
 Email info@chc.com.au
 Website www.chc.com.au

373 Campbell Street
 Suite 1118, Keilor Downs
 Telephone (02) 9221 9900
 Email info@bhc.com.au
 Website www.bhc.com.au

Copernicus Way, Keilor Downs VIC 3038

TOWN PLANNING
210016/TP05

23.09.2021



SITE AREA
5210 SQM

SITE COVERAGE
5210 SQM (54%)

SINGLE STOREY HOUSES

| | |
|---|----------------|
| TYPE A 1 BED, 1 BATH, SINGLE GARAGE | 13 UNITS (26%) |
| TYPE B 1 BED, 2 BATH, SINGLE GARAGE | 6 UNITS (12%) |
| TYPE C (VOLUME BUILDER) 3 BED, 2 BATH, SINGLE GARAGE | 4 UNITS (8%) |

TWO STOREY HOUSES

| | |
|--|----------------|
| TYPE D 1 BED, 1 BATH, SINGLE GARAGE | 24 UNITS (52%) |
|--|----------------|

TOTAL 47 UNITS

| |
|---------------|
| BEDROOM (80%) |
| BEDROOM (12%) |
| BEDROOM (8%) |

Legend

- EXISTING TREES TO BE RETAINED
- NEW TREES
NOTE: SUFFICIENT OPEN AREAS TO MEET DEEP SOIL PLANTING REQUIREMENTS.
- TITLE BOUNDARY
- 1800 HIGH SEMI-PERMEABLE VERTICAL SLAT FENCE
- 1800 HIGH SOLID VERTICAL SLAT FENCE

Attachment 15.1.3

Baptcare Housing Development - Keilor Downs

Overall Floor Plan First Floor Downs

L9 Melbourne Connect
700 Swanton Street
Carlton VIC 3053

378 Campbell Street
Sunny Hills NSW 2010
Telephone (02) 9221 9200

Copernicus Way, Keilor Downs VIC 3038

1:200 @ A1

1:400 @ A3

TOWN PLANNING

23.09.2021

210016/TP06





1 Existing Streetscape Elevation - Thornhill Drive
Scale Scale 1 : 200



2 Proposed Streetscape Elevation - Thornhill Drive
Scale Scale 1 : 200

L9, Melbourne Connect
700 Swanston Street
Carlton VIC 3053

3/78 Campbell Street
Sury Hills NSW 2010
Telephone (02) 9221 9200

Copernicus Way, Keilor Downs VIC 3038

Telephone (03) 9419 4340
Email studio@chc.com.au
www.chc.com.au

Email studio@chc.com.au
www.chc.com.au

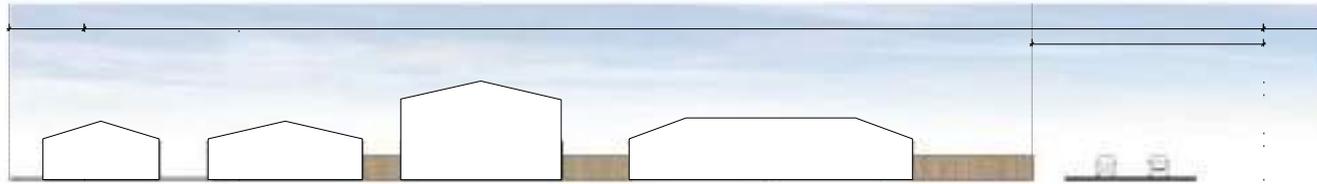
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1:400 @ A3

0

5

210016/TP07

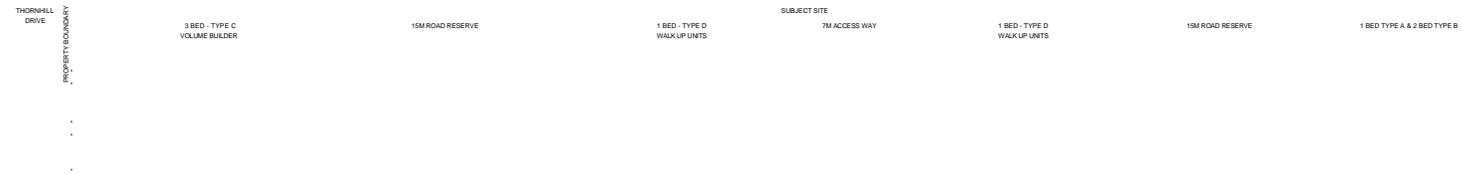




1 Proposed Streetscape - East Elevation
Scale Scale 1 : 200



2 Internal Laneway Streetscape - Section Looking Towards East
Scale Scale 1 : 200



3 Proposed Streetscape - North Elevation
Scale Scale 1 : 200



4 Internal Laneway Streetscape - Section Looking Towards Copernicus Way
Scale Scale 1 : 200

L9, Melbourne Connect
700 Swanston Street
Carlton VIC 3053

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Surry Hills NSW 2010
Telephone (02) 9221 9200

Copemicus Way, Keilor Downs VIC 3038

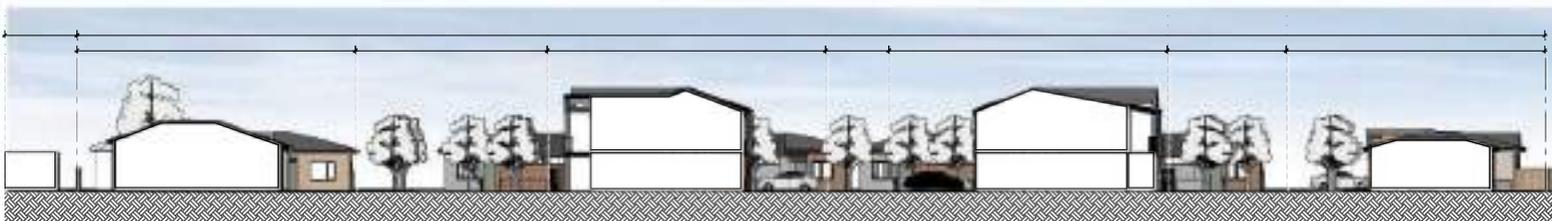
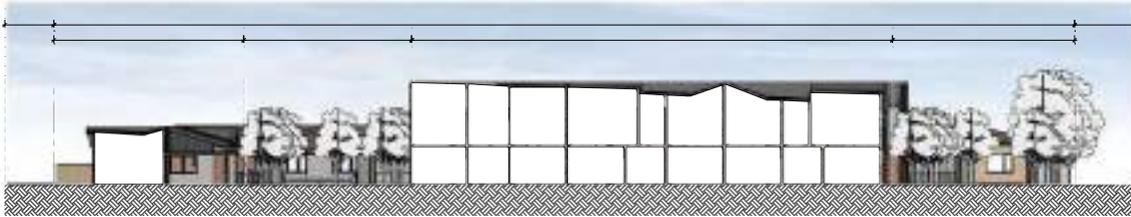
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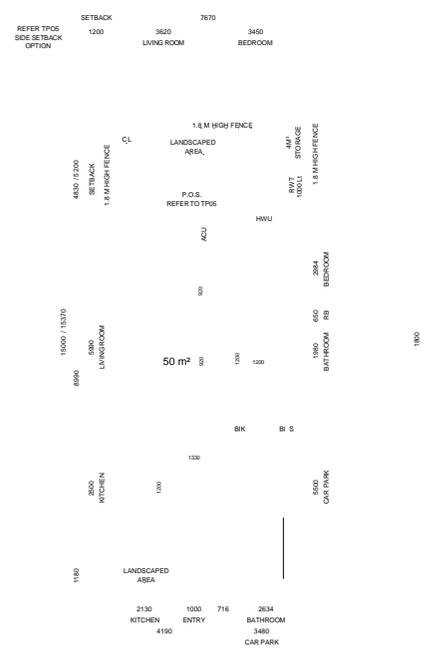
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210016/TP08

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Email studio@chc.com.au
www.chc.com.au

Email studio@chc.com.au
www.chc.com.au





Type A Rear and Side Fence
Scale 1 : 100

- BR-1 GREY TONE BRICK
 - BR-2 BROWN TONE BRICK
 - CL-1 TIMBER LOOK CLADDING
 - CL-2 EUCALYPT GREEN FEATURES
 - CFC-1 FC SHEET CLADDING
 - PM-1 PROFILE METAL CLADDING
- TYPE A - 1 BED**
- | | |
|---------------|--|
| DWELLINGS | 13 |
| LOT AREA | 115 SQM - 136 SQM |
| BUILDING SIZE | 50 SQM |
| P.O.S. | VARIES REFER TO TPOS |
| CARSPACE | 5.50 X 3.44 (18.9 SQM) |
| STORAGE | 6 M ² INTERNAL 4 M ² EXTERNAL |

Attachment 15.1.3

Baptcare Housing Development - Keilor Downs

Single Storey Unit Type A

Copernicus Way, Keilor Downs VIC 3038

1:100 R A1

1:200 R A3

0

5

TOWN PLANNING

210016/TP09

23.09.2021



Unit Type A (1 Bed)
Scale 1:100



Unit Type A Elevation A Facade 1
Scale 1:100

Unit Type A Elevation A Facade 2
Scale 1:100

Unit Type A Elevation A Facade 3
Scale 1:100

Unit Type A Elevation A Facade 4
Scale 1:100



Unit Type A Elevation B Facade 1
Scale 1:100

Unit Type A Elevation B Facade 2
Scale 1:100

Unit Type A Elevation B Facade 3
Scale 1:100

Unit Type A Elevation B Facade 4
Scale 1:100



L9, Melbourne Connect
700 Swanton Street
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Email studio@chc.com.au
www.chc.com.au

210016/TP10



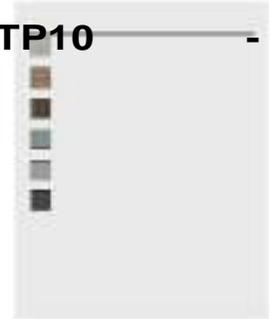
Unit Type B Elevation A Facade 1
Scale 1:100



Unit Type B Elevation A Facade 2
Scale 1:100



Unit Type B Elevation A Facade 3
Scale 1:100



Unit Type B Elevation B Facade 1
Scale 1:100



Unit Type B Elevation B Facade 2
Scale 1:100

Unit Type B (2 Bed)
Scale 1:100



Unit Type B Elevation C Facade 2
Scale 1:100

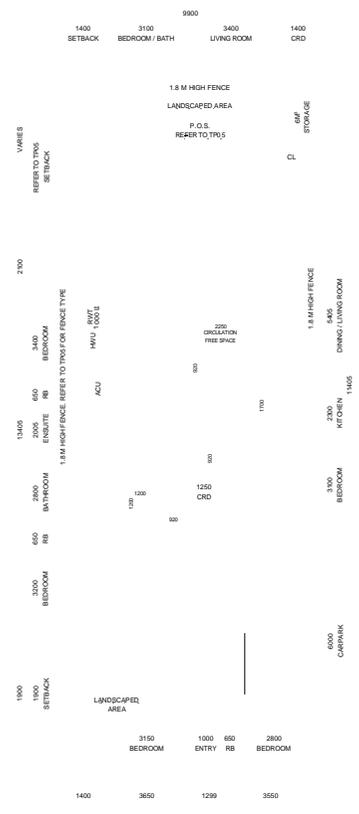


Unit Type B Elevation C Facade 1
Scale 1:100



Unit Type B Elevation D Facade 1
Scale 1:100





- BR-1 GREY TONE BRICK
- BR-2 BROWN TONE BRICK
- CL-1 TIMBER-LOOK CLADDING
- CL-2 EUCALYPT GREEN FEATURES
- CFC-1 FC SHEET CLADDING
- PM-1 PROFILE METAL CLADDING

TYPE C - 3 BED (VOLUME BUILDER)
 DWELLINGS
 LOT AREA 232 - 238 SQM
 BUILDING SIZE 38 SQM
 P.O.S. VARIES REFER TO TP05
 GARSPACE 6 X 3.5 (PT SQM)
 STORAGE 12 m³ INTERNAL
 6 m³ EXTERNAL

Type C Rear and Side Fence
 Scale 1 : 100

Attachment 15.1.3

ClarkeHopkinsClarke Sydney

L9, Melbourne Connect
700 Swanston Street
Carlton VIC 3053

378 Campbell Street
Surry Hills NSW 2010
Telephone (02) 9221 9200

Telephone (03) 9419 4340 Email studio@chc.com.au
Email studio@chc.com.au www.chc.com.au
www.chc.com.au



Baptcare Housing Development - Keilor Downs

Single Storey Unit Type C

Copernicus Way, Keilor Downs VIC 3038



Unit Type C Elevation A Facade 1
Scale 1:100



Unit Type C Elevation A Facade 2
Scale 1:100



Unit Type C Elevation B Facade 1
Scale 1:100



Unit Type C Elevation B Facade 2
Scale 1:100



Unit Type C Elevation C Facade 1
Scale 1:100



Unit Type C Elevation C Facade 2
Scale 1:100



Unit Type C Elevation D Facade 1
Scale 1:100



Unit Type C Elevation D Facade 2
Scale 1:100

1:100 @ A1

1:200 @ A1

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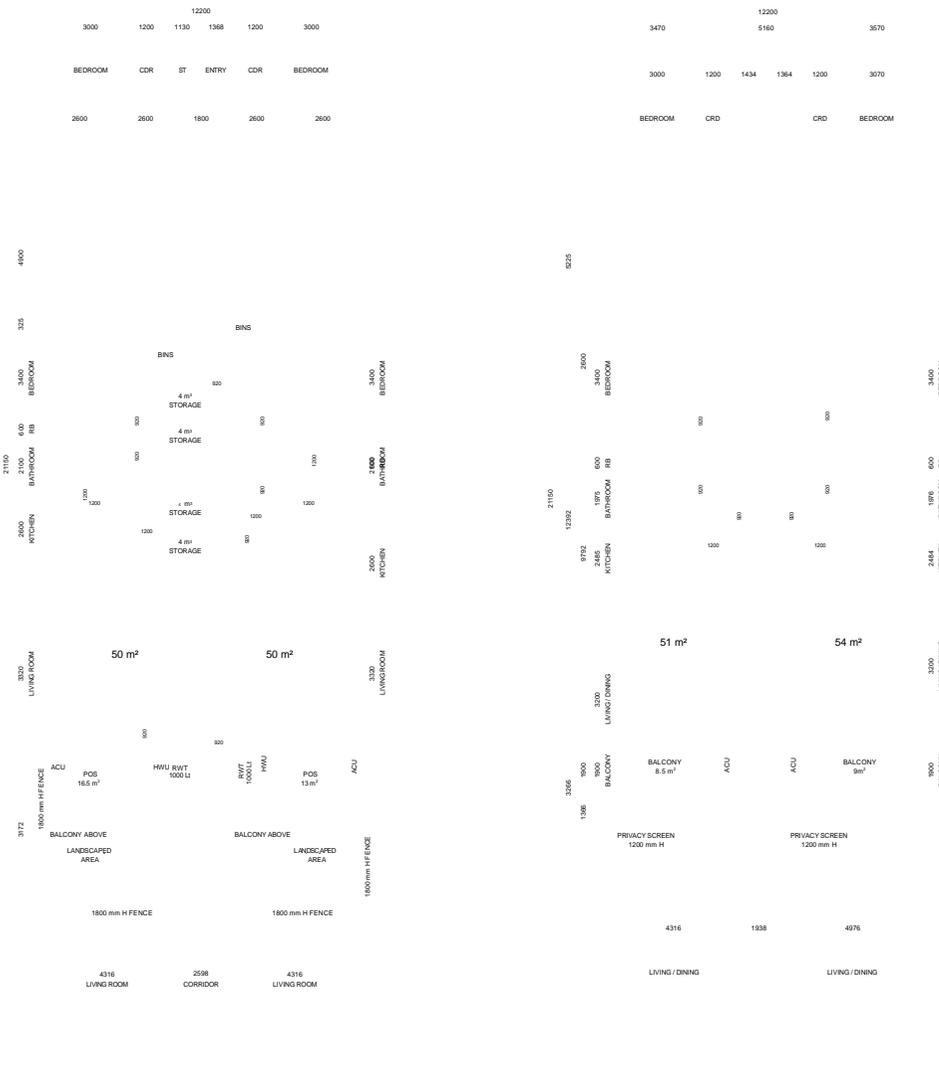
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TOWN PLANNING

23.09.2021

210016/TP11





- BR-1 GREY TONE BRICK
- BR-2 BROWN TONE BRICK
- CL-1 TIMBER-LOOK CLADDING
- CL-2 EUCALYPT GREEN FEATURES
- CFC-1 FC SHEET CLADDING
- PM-1 PROFILE METAL CLADDING

TYPE D - 1 BED DWELLINGS
 LOT AREA 12
 BUILDING SIZE 131.15 SQM (PER 2 UNITS)
 P.O.S. (G/F) 50 SQM (EACH UNIT)
 P.O.S. (1/F) 8 SQM (11.7%)
 BUILDING SIZE 50 SQM (EACH UNIT)
 CARSPACE 4.9 X 2.6 (12.7 SQM NOM)
 STORAGE 6 M² INTERNAL
 4 M² EXTERNAL

Unit Type D Bin Enclosure
Scale 1 : 100

Unit Type D Fence
Scale 1 : 100

Attachment 15.1.3

U.S. Mechanical Connect
700 Swanton Street
Carleton Place, ON N4C 3G3

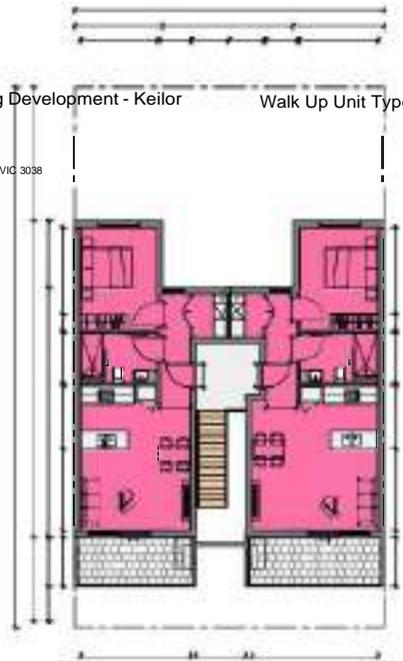
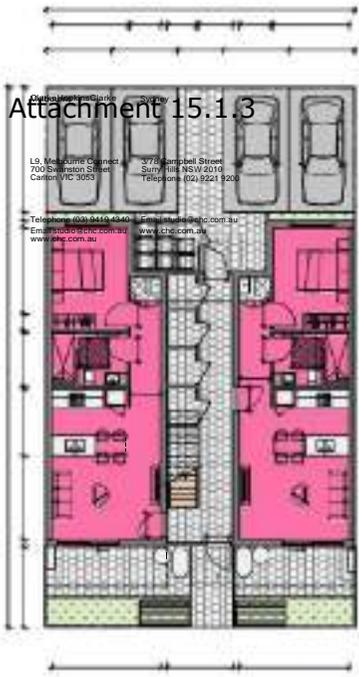
378 Campbell Street
Sunny Hill NSW 2010
Telephone: (02) 9221 9200

Telephone: (03) 6440 4340
Email: studio@chc.com.au
www.chc.com.au

Email: studio@chc.com.au
www.chc.com.au

Baptcare Housing Development - Keilor Downs Walk Up Unit Type D Downs

Copernicus Way, Keilor Downs VIC 3038



1:100 @ A1

1:200 @ A3

0

5



210016/TP12

23.09.2021

Unit Type D Ground Floor (1 Bed Walk-Up)
Scale: 1:100

Unit Type D Level 1 (1 Bed Walk-Up)
Scale: 1:100



Unit Type D Elevation A Facade 1
Scale: 1:100

Unit Type D Elevation B Facade 1
Scale: 1:100

Unit Type D Elevation C Facade 1
Scale: 1:100

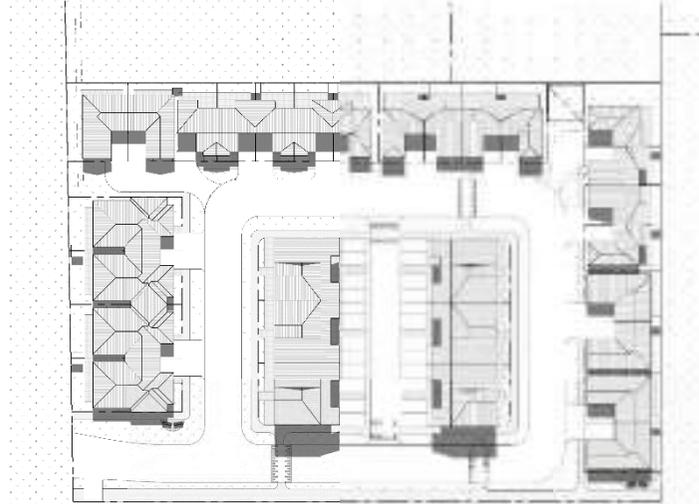
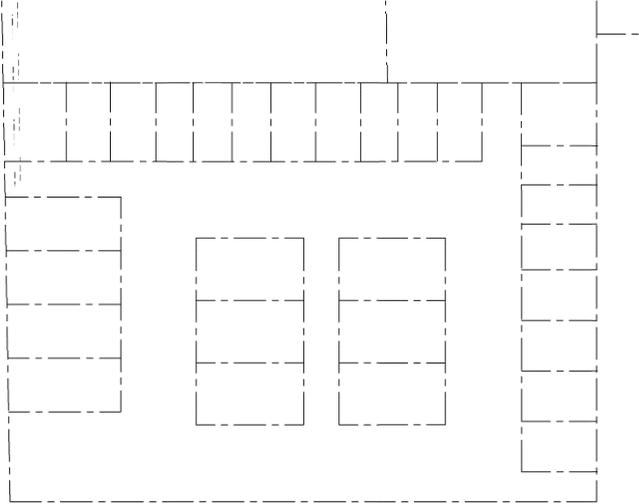
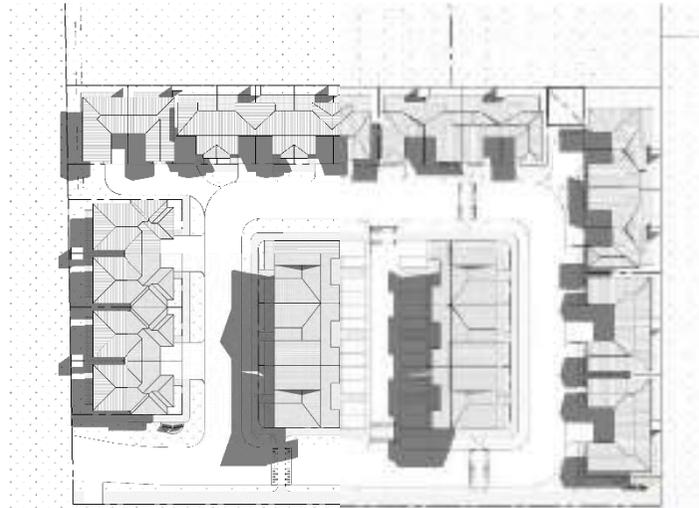
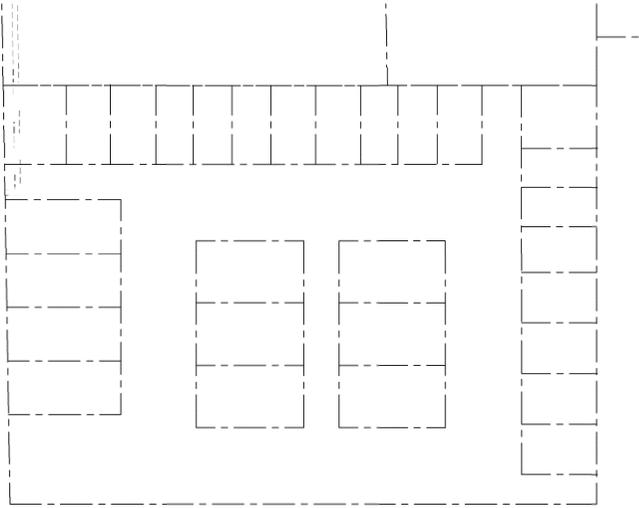
Unit Type D Elevation D Facade 1
Scale: 1:100

1 Shadows for Sept 22 at 9am_Existing
Scale 1 : 500

3 Shadows for Sept 22 at 9am
Scale 1 : 500

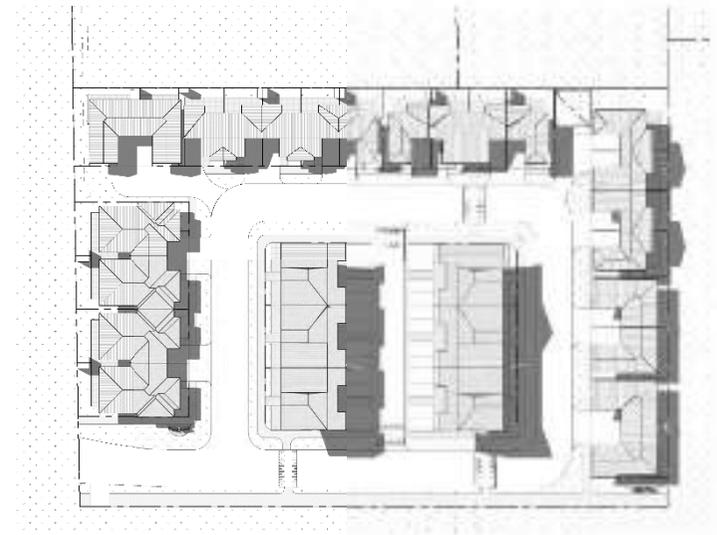
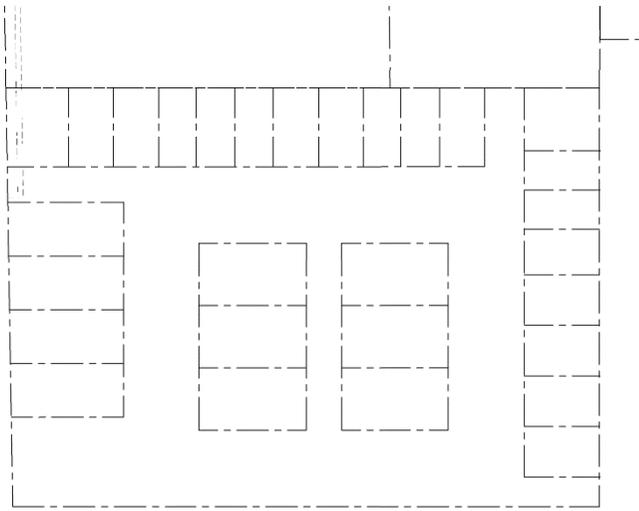
2 Shadows for Sept 22 at 12 noon_Existing
Scale 1 : 500

4 Shadows for Sept 22 at 12 noon
Scale 1 : 500



1 Shadows for Sept 22 at 3pm_Existing
Scale 1 : 500

2 Shadows for Sept 22 at 3pm
Scale 1 : 500





Varied Streetscapes



Proportion and Rhythm



Fine, Simple Detailing



Textural Elements



BR-1
Grey Tone Brick



BR-2
Brown Tone Brick



CL-1
Timber-Look Cladding



CL-2
Eucalypt Green Features



CFC-1
FC Sheet Cladding



PM-1
Profile Metal Cladding







Detailed Assessment

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| Reference Number: | SUB/029339 |
| Location: | Part of land (south portion) of 21A Copernicus Way, Keilor Downs |
| Proposal: | Development of 47 dwellings |
| Applicant: | Baptcare Affordable Housing, C/- Urbis Pty Ltd |
| Zoning/Overlay: | <ul style="list-style-type: none"> Commercial 1 Zone, Development Plan Overlay Schedule 2 Development Contributions Plan Overlay Schedule 2 <p>The north portion of 21A Copernicus Way is affected by a Special Building Overlay however this is outside the application site area.</p> |
| Adjoining Zoning/Overlay: | <p><u>Zone</u></p> <ul style="list-style-type: none"> Surrounding land to the north, south and west is zoned General Residential Zone Schedule 1 apart from a small section on the south-western side which is zoned Residential Growth Zone Schedule 1 and Public Use Zone Schedule 6. Land to the south west is zoned Residential Growth Zone Schedule 1 The land to the east is zoned Commercial 1 Zone (this includes the shopping centre now known as Keilor Central.) <p><u>Overlay</u></p> <ul style="list-style-type: none"> The Special Building Overlay extends to the north of the site. The Development Plan Overlay Schedule 2 extends to the north and west of the site. All surrounding land is affected by the Development Contributions Plan Overlay Schedule 2. |
| Potential Contamination: | A detailed history search of the subject site has not revealed any industrial or potentially polluting uses. No further assessment is required. |
| Proximity to former Land Fill sites: | The site is located outside the recommended buffer distance from the nearest former landfill. Accordingly, no landfill gas assessment of this site is required prior to the proposed development if an application was made to Council. |
| Cultural Heritage Management Plan: | Not required as the site is not located within an area of Aboriginal or Cultural Sensitivity. |
| Restrictive Covenant: | <p>Yes – Covenant No. AL706333U is registered on the Title.</p> <p>A covenant is registered on the Title. It states that the land will not at any time:</p> <ol style="list-style-type: none"> erect or allow to be erected on the Servient Land any shop or shops with an aggregate gross floor area of greater than 800 square metres; or, use or permit to be used any building or buildings on the Servient Land or any other part or parts of the Servient Land, together with an aggregate gross floor area of greater than 800 square metres, wholly or predominantly for the sale of hire of goods by retail or the retail provision of services, provided such covenant shall lapse on 1 January 2030 and have no further effect from that date. |

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| | The proposal does not breach the covenant. |
| Section 173 Agreement: | There is no Section 173 Agreement registered on the title. |
| Planning History: | <ul style="list-style-type: none"> • A Development Plan (P586/2013) was approved on 02/06/2014 under Schedule 2: Keilor Downs Plaza Shopping Centre of Clause 43.04 of the Brimbank Planning Scheme. The Development Plan identifies the site as future residential/ mixed use. • Planning Permit P584/2013 was issued on 02/06/2014 for a four (lot) commercial subdivision for all of the land within the Commercial 1 Zone. The subdivision effectively created three (3) super lots and excised the shopping centre as its own lot • Planning Permit P637/2018 was issued on 20/03/2019 to allow the removal of native vegetation on the site. The permit is still valid. • Planning Permit P0145/2020 was issued on 09/10/2020 for the use and development of the northern part of 21A Copernicus Way for a residential aged care centre. This permit is still valid. |
| Considered Documents: | <p>Considered Documents and Plans all received on 27th September 2021</p> <ul style="list-style-type: none"> • Town Planning Report prepared by Urbis Pty Ltd • Town Planning Report (Service Engineering) prepared by BRT Consulting Pty Ltd • Stormwater Management Plan prepared by FMG Engineering • Sustainability Management Plan prepared by Energy Water Environment • Plans of proposal prepared by Clarke Hopkins Clarke (TP00 – TP18) • Site Plan prepared by BRT Consulting Pty Ltd • Landscape Plan prepared by Fitzgerald Frisby Landscape Architect • Traffic Report prepared by One Mile Grid • Traffic Drawings prepared by One Mile Grid. <p>It is noted that the bathroom windows shown on the elevations for dwelling type A are not shown on the floor plans. This will be required as a change to the plans.</p> |
| Notification to Council Required Pursuant to: | <p><u>Definition of Use</u> Pursuant to Clause 73.03 of the Brimbank Planning Scheme the proposed use is defined as a dwelling.</p> <p><u>Clause 52.20: Victoria's Big Building</u></p> <p>This clause applies to the use or development of land that is:</p> <ul style="list-style-type: none"> • Funded wholly or partly, under Victoria's Big Housing Build program; and • Carried out by or on behalf of the Director of Housing. <p><u>Clause 52.20-2: Exemption from planning scheme requirements</u> Any requirement of this planning scheme to obtain a permit or any provision of this planning scheme that prohibits the use or development of land, requires the use or development of land to be carried out in a particular manner, or requires a specified thing to be done to the satisfaction of a specified person or body, does not apply to any use or development this clause 52.20 applies to if requirements of clause 52.20 are met.</p> <p>In terms of the provisions above, the proposed use and development is part funded under Victoria's Big Housing Build program and is carried out</p> |

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| | <p>on behalf of the Director of Housing. Therefore no planning permit is required from Council.</p> <p>However under Clause 52.20-4: Consultation requirements</p> <ul style="list-style-type: none"> Public consultation, and <u>consultation with the relevant municipal council, must be undertaken.</u> <p>Following this consultation the applicant intends to finalise the application and submit to the Department of Environment, Land, Water and Planning (DELWP) for determination on behalf of the Minister for Energy, Environment and Climate Change.</p> |
| <p>Proposal Details:</p> | <p><u>General Layout</u></p> <p>The proposal involves of 47 social housing dwellings. The proposal comprises a mixture of four building types:</p> <ul style="list-style-type: none"> Type A: A single-storey building containing 1 unit with 1 bedroom. There are 13 buildings of this type. Type B: A single-storey building containing 1 unit with 2 bedrooms. There are 6 buildings of this type. Type C: A single-storey building containing 1 unit with 3 bedrooms. There are 4 buildings of this type. Type D: A two storey walk-up building containing two units, one on the ground floor and another on level 1. There are 12 buildings of this type. <p>In terms of the layout the single storey dwellings are proposed along the east and west boundaries shared with the adjoining lots and along the north boundary (the internal site boundary). The double storey dwellings are located centrally within the site.</p> <p>In relation to the existing dwellings to the west, 5 of the dwellings' secluded private open space areas abut the shared boundary. The dwellings are setback a minimum of 3.65 metres from the western boundary shared with the adjoining residential properties.</p> <p><u>Design Detail</u></p> <p>The dwellings are simple in their design with each dwelling provided with slight variations in roof/ material composition. All dwellings use pitched roofs (hipped, gable and low roof pitches) with predominantly brick materials and a variety of cladding to provide visual interest to the development and streetscape. All dwellings including strong fenestration to the proposed street with the upper floor units of the two storey buildings also including upper floor balconies overlooking the streets.</p> <p><u>Access/ Car Parking</u></p> <p>It is proposed to extend Thornhill Drive from the west and create two-way road connection to the site, which transitions from the existing 17.57m road reserve to a 15m road reserve within the site. The proponent has confirmed that it is the intention to construct the roads as public roads and hand them over to Council upon completion.</p> <p>There are 47 parking spaces provided in total, with each dwelling including one open car parking space. Each single storey dwelling's car parking space will be located to the front adjacent to the entry to the dwellings. The car parking for the two storey buildings will be accessed from a rear lane centrally located within the site with a shared pathway leading to the entry of the ground floor dwelling and the stairway for the upper floor dwelling.</p> |

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| | <p>In addition a 2.5 metre shared path is proposed along the southern boundary linking the existing residential area to the west with a connection to the shopping centre to the east.</p> <p><u>Private Open Space</u> Each single storey dwelling is provided within its own private open space ranging between 27 square metres and 96 square metres. The secluded private open space areas have a minimum depth of over 3.0 metres and a minimum area of 25 square metres.</p> <p>For the double storey dwellings the ground floor units have access to a minimum of 14 square metres of private open space with the upper level units having a balcony of a minimum size of 9 square metres facing towards the road. There is also a communal space of 21 square metres shared between the units.</p> <p><u>Landscaping</u> An indicative landscape plan has been provided. This includes street trees throughout the development including abutting the shared pathway to the north. In addition each single storey dwelling proposes a tree within the front setback and rear secluded private open space areas. For the two storey buildings a tree is located within the front setback for each ground floor unit.</p> <p><u>Other Features</u> A small pocket park is proposed at the south-east corner of the site adjacent to the shared accessway and the car park of the adjoining shopping centre. An area for a substation is proposed at the north-west corner of the site.</p> |
| Site & Surrounds: | <p><u>Subject Site</u> The land known as 21A Copernicus Way is an irregular shaped parcel of land comprising a total area of 2.247 Hectares located on the southern side of Copernicus Way, to the west of Thornhill Drive. It is located within the Keilor Downs Major Activity Centre. It is currently vacant and has an informal path that traverses from the north-west corner of the site from Copernicus Way to the south-east corner of the site to Keilor Central car park. A second path is accessed from Thornhill Drive at the south-west corner before immediately deviating into the abutting land to the south.</p> <p>The subject site forms the southern portion of 21A Copernicus Way comprising an area of 9,524.69sqm, bound by Thornhill Drive and residential dwellings to the west, Council land to the south and Keilor Central shopping centre to the east.</p> <p>The site currently has no vehicle access or crossovers in place. Drainage and sewerage easements are located along the northern and western site boundaries. The site has sparse vegetation cover and the topography of the allotment is flat, with only a minor fall to the north east.</p> <p><u>Surrounding Area</u> In terms of the surrounding area:</p> <ul style="list-style-type: none"> • Northern Interface: To the north beyond the vacant land that forms part of the wider land known as 21A Copernicus Way there is a 9-metre wide (approximate) nature strip with no significant vegetation. On the north side of Copernicus Way there are six single and double storey detached dwellings that front the land. • Eastern Interface: Abutting the site to the east is vacant land and car |

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| | <p>parking for the Keilor Central.</p> <ul style="list-style-type: none"> • Southern Interface: The land to the south of the site is vacant Council land. Thornhill Drive to the west is currently connected by an informal pedestrian path to the shopping centre to the south-east. The car park belonging to the shopping centre is located south-east of the site. Further south is the Keilor Downs Community Centre and the Brimbank Aquatic and Wellness Centre (currently under construction), which abuts Taylors Road, an arterial road, to the south. • Western Interface: To the west the rear private open space of the dwellings which front Milas Court directly abut the subject site. The western title boundary features timber paling and corrugated iron fencing. Thornhill Drive currently ends in a no-through road, with informal pathways across the site towards the shopping centre. <p>In terms of the wider area the land to the north and west and to the south beyond Taylors Road is predominantly residential. Of note to the north-east (north of the shopping centre) 116 dwellings were approved and are currently under construction, with some of them already occupied.</p> <p>In addition the site is located within 500 metres of the following services and amenities reflecting its Activity Centre location:</p> <ul style="list-style-type: none"> • Bus Route Nos. 418, 421 traversing Copernicus Way towards Keilor Central shopping Centre • Bus Route No. 419 traversing Sunshine Avenue • St Albans Leisure Centre • Community Centre • Packard Street Skate Park • Medical clinic and chemist • Story House Early Learning Centre • Keilor Downs Police Station • Estia Health Keilor • Keilor Downs Dental • Keilor Downs Medical Clinic. |
| <p>Notification:</p> | <p>Whilst Council is not the Responsible Authority for the planning application, Clause 52.20-4: Consultation Requirements states:</p> <p><i>Before the use and development:</i></p> <ul style="list-style-type: none"> • <i>Public consultation, and consultation with the relevant municipal council, must be undertaken.</i> • <i>A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to must be prepared to the satisfaction of the responsible authority.</i> <p>The consultation is required to be carried out by the proponent. All responses must be considered by the applicant and the associated report explaining how the feedback was considered must be provided to DELWP when the application is lodged for assessment and ultimate decision by the Minister for Energy, Environment and Climate Change.</p> <p>Despite the consultation being undertaken by the proponent, a number of residents have contacted Council raising concerns about the proposal, and in particular the density, traffic impacts and concerns about the use for social housing. Additionally an on-line petition has been arranged opposing the development and currently has in excess of 1,000 signatures.</p> |

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| Referrals: | <p>The application was referred to the following departments.</p> <p><u>Traffic</u> Council's Traffic Engineers have not raised any objections to the principle of the proposal, but have made the following comments:</p> <ul style="list-style-type: none"> • Corner properties have not been provided with splays in accordance with Council's sub-division standards and guidelines • Footpaths do not align at 90 degrees, e.g. across the extended driveways • Vehicle crossover splays have not been shown to Council's current standards with 1200mm splays • Radii on the inside of the bends seems too small and need to be increased • A Functional Layout Plan (FLP) and detail design is required • End car parking spaces adjacent to the footpath require a buffer/separator between the car space and the footpath. <p>A number of the items above may be resolved in the FLP.</p> <p><u>Urban Design</u> Council's Urban Design Department, whilst not raising any objections to the principle of the proposal, have made the following comments;</p> <ul style="list-style-type: none"> • In reviewing the landscape concept plan and site plan, it seems that some of the locations of some of the proposed pits and underground services are too close to the proposed locations for some of the trees. Further information should be required and amend drawings to make sure that there is enough space for a tree without being interrupted by a pit or underground services. • A cross-section is required to provide more info regarding trees and underground services, etc. • The landscape plan is just a conceptual landscape plan. A detailed landscape plan is required (show all proposed species and location, trees, shrubs, dimensions of garden beds, underground services, surface material, etc.) • Concern is raised regarding the urban heat island effect and visual quality of the central laneway. Additional landscaping treatment is required along the laneway (central laneway with garage access to apartments). <p><u>Drainage</u> In terms of the Stormwater Management Plan the information submitted needs to be revised to comply with conditions relating to the site outfall drain below. Other conditions also would be recommended if a permit was issued:</p> <ul style="list-style-type: none"> • An outfall drain is to be constructed through to the front portion of the site to be connected to Melbourne Water's drain via Council's pit. Alternatively existing Council drainage along the western boundary of the subject site to be upsized up to Melbourne Water's drain on Copernicus Way to the satisfaction of Council's Engineering Department. Melbourne Water's consent may be required. Plan checking and supervision fees will be applied for the outfall drain. • Car spaces, access lanes & driveways must be maintained and kept available for these purposes at all times. • Protective kerbs (of a minimum height of 150 mm) must be provided to the satisfaction of the Responsible Authority to prevent damage to fences or landscaped areas and to control drainage flows. • Vehicular crossing(s) must be constructed to the road to suit the |
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proposed driveway(s) to the satisfaction of the Responsible Authority prior to any works being undertaken on the site. A Vehicle Crossing Permit must be obtained from Council's Engineering Department prior to any works commencing on the site

- Access to the site and ancillary road works must be constructed in accordance with the requirements of the Responsible Authority.
- An on-site stormwater drainage retention/detention system must be designed by a qualified Engineer and installed on the subject land to the satisfaction of the Responsible Authority. The on-site retention/detention system is to be constructed before occupancy permit or statement of compliance whichever is the earliest.
- The entire development site must be connected to the existing underground drainage and sewerage systems to the satisfaction of the Responsible Authority.
- The crossover must be located and constructed to the satisfaction of the Responsible Authority in accordance with plans approved by the Responsible Authority. The plans submitted must show all services within the road reservation including power poles, drainage pits, Telstra pits, trees, road humps, bus stops and any other road infrastructure or asset that may hinder or impact on the operation of the crossover.
- The developer is to incorporate Water Sensitive Urban Design (WSUD) principles into the design. The design is to be certified by a competent Engineer and provided to the Responsible Authority
- The developer is to provide an Environmental Management Plan for the construction phases of the development works certified by a competent engineer and provided to the Responsible Authority
- The developer is required to construct an outfall drain from the property to connect with to the satisfaction of the Responsible Authority. Plans are to be prepared by a competent engineer and submitted to Council's Engineering department for approval. Works are to be undertaken in accordance with Council's standards. Checking and supervision fees will be required
- The developer is required to construct the laneway with an all-weather seal (either concrete or asphalt) including all related drainage works to the satisfaction of the Responsible Authority.

ESD Officer

Council's ESD Officer noted there was good thermal performance and photovoltaic arrays for each dwelling above normal. Whilst noting that Council's ESD Policy (Clause 22.02) is not applicable in this instance the following information changes were sought in summary.

Revised plans/ documents relating to Environmental Sustainable Design to include:

- Thermal performance rating,
- Extent of double glazing,
- Stormwater treatment devices
- Visitor bicycle parking,
- A note stating all windows can be locked in an open position
- A skylight for all bathrooms without windows.
- For Dwelling Type C, an operable fanlight/top light over the front door (or a secure screen door) to allow effective cross-ventilation
- Details of shading devices for all habitable windows facing the north east and west

Discussion on Referral Advice

In terms of matters raised the following is stated:

- The majority of Council's Traffic Engineer's recommendations can be

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| | <p>addressed as changes required to the plans. In addition, whilst Council's Traffic Engineer stated that waste collection may be able to be delivered by Council, a Waste Management Plan should be required to demonstrate this was the case or alternatively private waste collection will be required.</p> <ul style="list-style-type: none"> • Council's Drainage Department recommendations can be dealt with as required changes to the plans or the Stormwater Management Plan. • Council's Urban Design Department comments can be requested as changes to the plans. The rear access lane has opportunities to provide areas of landscaping at the rear of the ground floor dwellings. This should form part of the detailed landscaping. In addition, details of the pocket park can be required, including any furniture/ play equipment proposed. • Council's ESD Officer's comments can be required as changes to the Sustainability Management Plan (SMP). |
| <p>Planning Scheme Requirements:</p> | <p>Whilst Council is not the Responsible Authority of this application, in order for a response to be provided to the formal consultation requirements, an assessment was undertaken under the various provisions of the Brimbank Planning Scheme.</p> <p>Planning Policy Framework Clause 11 – Settlement Clause 12.1-S – Native Vegetation Clause 15 – Built Environment and Heritage Clause 16 – Housing Clause 18 - Transport</p> <p>Local Planning Policy Framework Clause 21 – Municipal Strategic Statement Clause 21.06 – Built Environment Clause 21.07 – Housing Clause 21.07-1 - Residential Growth Clause 21.07-2 – Housing Diversity Clause 21.07-3 – Residential Design Clause 21.10 – Transport and Infrastructure Clause 22.02 – Environmentally Sustainable Development (ESD)</p> <p>Zoning Provisions Clause 34.01: Commercial 1 Zone</p> <p>Overlay Provisions Clause 43.04: Development Plan Overlay Keilor Downs Plaza Shopping Centre Clause 44.05 – Special Building Overlay (SBO)</p> <p>Particular Provisions Clause 52.20 - Victoria's Big Building</p> |
| <p>Comparison against Planning Controls:</p> | <p>Planning Policy Framework <u>Clause 11 - Settlement</u> <i>Planning is to anticipate and respond to the needs of existing and future communities through provision of zoned and serviced land for housing, employment, recreation and open space, commercial and community facilities and infrastructure.</i></p> <p>On 31 March 2017, the State Government updated Plan Melbourne to <i>Plan Melbourne 2017-2050: Metropolitan Planning Strategy</i>. This document is listed as a background document in Clause 72.08 of the Scheme.</p> |

Based on the vision of a global city of opportunity and choice, the Plan provides a blueprint for ensuring suburbs develop and grow but never at the expense of neighbourhood character. It also aims to deliver well-connected 20-minute neighbourhoods with jobs and services closer to where people live, clarity about where growth can occur in the suburbs and a greater focus on public parks and private garden areas.

Plan Melbourne is structured around 9 principles to guide policies and actions and 7 outcomes to state the ambitions of the plan. Within each outcome, directions and further policies/actions outline how the *Plan Melbourne* vision will be achieved.

Clause 11.02- 1S – Supply of Urban Land

The objective is to ensure sufficient supply of land for residential uses to support sustainable urban development and planning for urban growth should consider neighbourhood character and landscape considerations.

Clause 11.03-1S: Activity centres

The objective is to encourage the concentration of major retail, residential, commercial, administrative, entertainment and cultural developments into activity centres that are highly accessible to the community

Clause 11.03-1R: Metropolitan Activity centres

Strategies include:

- *Support the development and growth of Metropolitan Activity Centres by ensuring they:*
 - *Are able to accommodate significant growth for a broad range of land uses.*
 - *Are supported with appropriate infrastructure.*
 - *Are hubs for public transport services.*
 - *Provide high levels of amenity.*

Clause 12.01-2S: Native vegetation management

The objective is ensure that there is no net loss to biodiversity as a result of the removal, destruction or lopping of native vegetation.

Clause 15.01-1S Urban design

The objective is to create urban environments that are safe, healthy, functional and enjoyable that contribute to a sense of place and cultural identity and require development:

- *To respond to its context in terms of character and surrounding landscape,*
- *To ensure the interface between the private and public realm protects and enhances personal safety.*

Clause 15.01-2S Building design

The objective is to create building design outcomes that contribute positively to the local context and enhance the public realm to ensure the site analysis provides the basis for the consideration of height, scale and massing of new development to:

- *Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.*
- *Ensure the form, scale and appearance of development enhances the function and amenity of the public realm.*
- *Ensure buildings and their interface with the public realm support personal safety, perceptions of safety and property security.*

- *Ensure development provides safe access and egress for pedestrians, cyclists and vehicles.*
- *Ensure development provides landscaping that responds to its site context, enhances the built form and creates safe and attractive spaces.*
- *Encourage development to retain existing vegetation.*

Clause 15.01-4S: Healthy neighbourhoods

The objective is to achieve neighbourhoods that foster healthy and active living and community wellbeing.

Clause 15.01-4R: Healthy neighbourhoods - Metropolitan Melbourne

The strategy is to create a city of 20 minute neighbourhoods that give people the ability to meet most of their everyday needs within a 20 minute walk, cycle or local public transport trip from their home.

Clause 15.01-5S Neighbourhood character

The objective is to recognise, support and protect neighbourhood character, cultural identity and sense of place to ensure that development responds to its cultural identity and contributes to existing and preferred neighbourhood character.

Clause 16.01-1S Housing Supply

The objective is to facilitate well-located, integrated and diverse housing that meets community needs.

Strategies include:

- *Ensure that an appropriate quantity, quality and type of housing is provided, including aged care facilities and other housing suitable for older people, supported accommodation for people with disability, rooming houses, student accommodation and social housing.*
- *Increase the proportion of housing in designated locations in established urban areas (including under-utilised urban land) and reduce the share of new dwellings in greenfield, fringe and dispersed development areas.*
- *Encourage higher density housing development on sites that are well located in relation to jobs, services and public transport.*
- *Identify opportunities for increased residential densities to help consolidate urban areas.*
- *Facilitate diverse housing that offers choice and meets changing household needs by widening housing diversity through a mix of housing types.*
- *Encourage the development of well-designed housing that:*
 - *Provides a high level of internal and external amenity.*
 - *Incorporates universal design and adaptable internal dwelling design.*
- *Support opportunities for a range of income groups to choose housing in well-serviced locations.*

Claus 16.01-1R Housing supply - Metropolitan Melbourne

Strategies include:

- *Manage the supply of new housing to meet population growth and create a sustainable city by developing housing and mixed use development opportunities in locations that are:*
 - *Metropolitan activity centres and major activity centres.*
 - *Neighbourhood activity*
- *Identify areas that offer opportunities for more medium and high density housing near employment and transport in Metropolitan*

Melbourne.

- *Facilitate increased housing in established areas to create a city of 20 minute neighbourhoods close to existing services, jobs and public transport.*
- *Create mixed-use neighbourhoods at varying densities that offer more choice in housing.*

Clause 16.01-2S Housing Affordability

The objective is to deliver more affordable housing closer to jobs, transport and services.

Strategies include:

- *Improve housing affordability by:*
 - *Ensuring land supply continues to be sufficient to meet demand.*
 - *Increasing choice in housing type, tenure and cost to meet the needs of households as they move through life cycle changes and to support diverse communities.*
 - *Promoting good housing and urban design to minimise negative environmental impacts and keep costs down for residents and the wider community.*
 - *Encouraging a significant proportion of new development to be affordable for households on very low to moderate incomes.*
- *Increase the supply of well-located affordable housing by:*
 - *Facilitating a mix of private, affordable and social housing in suburbs, activity centres and urban renewal precincts.*
 - *Ensuring the redevelopment and renewal of public housing stock better meets community needs.*
 - *Facilitate the delivery of social housing by identifying surplus government land suitable for housing.*

Clause 18.02-4S: Car parking

The objective is to ensure an adequate supply of car parking that is appropriately designed and located.

Assessment

The proposed development will be located within the Keilor Downs Major Activity Centre, where both the activity centre and housing supply policies seek to concentrate higher density housing creating a 20 minute neighbourhood close to services, jobs and public transport.

The proposal will provide additional affordable housing consistent with the housing affordability strategies above.

The proposal has been architecturally designed and the single and double storey built form is consistent in scale with the surrounding residential properties. Importantly, the single storey dwellings are proposed adjacent to the residential properties to the west consistent with the design and neighbourhood character policies and minimising the impact on them.

Whilst native vegetation has been identified on the wider, site there is a valid planning permit in place for the removal of native vegetation on the site with appropriate offsets in place.

Adequate car parking has been provided with one space for each dwelling exceeding the minimum car parking requirements discussed below. Council's Traffic Engineer has not raised any objections in principle to the development subject to modifications that will form recommended changes to the plans.

The application has been assessed against the Planning Policy Framework and it is considered that the proposed development is consistent with relevant policies contained within this section of the Brimbank Planning Scheme.

Local Planning Policy Framework

Clause 21.02 Key Land Issues

Built Environment

Well-designed development which contributes to the desired neighbourhood character, contributes to the community's sense and pride of place will be encouraged.

High quality urban design is the key to achieving a sustainable future for Brimbank. Quality urban design will be a driving force in the assessment of future development.

Housing

The expected ageing population will create an increased demand for smaller dwellings and aged care accommodation and services.

Housing within Brimbank is expected to increase from approximately 61,411 dwellings in 2006 to 72,570 dwellings in 2026, with the average household size falling from 2.94 to 2.77 residents per household.

There are no greenfield development sites remaining within Brimbank and it is expected that population growth will be contained within infill medium and higher density developments, in activity centres, the General Residential Zone and Residential Growth Zone.

Retailing and Activity Centres

In addition, Brimbank supports a number of Activity Centres and Neighbourhood Activity Centres which are of significance to the municipality and support the 20 minute neighbourhood objective of Plan Melbourne. These centres serve as community and economic hubs that provide opportunities for future housing and commercial development.

Clause 21.04 Strategic Land Use Vision

Built Environment: support the use of sustainable and resource efficient principles, high quality architecture and urban design for all future development, while protecting and enhancing Brimbank's unique heritage places and precincts, and natural land forms, escarpments and ridgelines.

Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.

Clause 21.07-1 Residential Growth

In response to the Metropolitan Strategy, the Western Regional Housing Statement was developed to identify opportunities for residential development in Brimbank and the western region. It was identified that the City of Brimbank could accommodate an increase of some 7,800 additional households to the year 2030. The study anticipated that 4,500 households will be in the form of dual occupancy and medium density housing. The Victoria in Future 2012 analysis undertaken by the State Government suggests that these figures are understated and that households are expected to increase in excess of 19,138 households to

the year 2051.

There are no longer large scale greenfield sites within the municipality available for substantial residential development. Any future development is likely to be located in key strategic development sites, surplus industrial areas, and within activity centres. Future structure planning will provide direction for the provision of increased residential development within the activity centres.

Housing intensification can increase the urban heat island effect. Increased tree planting and green open spaces can reduce urban temperatures and can help to manage this impact and will be required in to be included in all new medium and higher density developments.

The Brimbank Housing Strategy, 'Home and Housed' specifies locations of substantial, incremental and limited change, and recommends preferred built form and design outcomes.

Objective 1

- *To accommodate appropriate residential growth in identified locations.*

Strategies (relevant)

- *Encourage higher residential densities within the Residential Growth Zone. Encourage higher residential densities within activity centres which are well serviced by public transport, services and community facilities.*

Clause 21.07-2 Housing Diversity

Objective 1

- *To ensure a range of housing types are available to meet the diverse needs of residents.*

Strategies (relevant)

- *Encourage dwellings that are adaptable to changing housing needs.*
- *Encourage new multi-unit residential developments to incorporate a diversity of housing types to meet the needs of different households.*
- *Encourage the provision of affordable housing in new larger scale residential developments.*

Clause 21.07-3 Residential Design

Objective 1:

- *To promote development that is well designed, innovative, and responds to its location and context.*

Strategies (relevant):

- *Ensure new development provides an address to the street and incorporates articulated facades.*
- *Encourage new development to incorporate high quality urban design, architectural detail and use of robust materials.*
- *Ensure new development respects the neighbourhood character*

Objective 2:

To facilitate the development of attractive, safe high amenity neighbourhoods that have a strong sense of identity.

Strategies to achieve this objective include:

- *Ensure new development integrates with its surrounding environment and does not detract from the rhythm of the streetscape in terms of*

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| | <p><i>building design, height, massing and setbacks</i></p> <ul style="list-style-type: none"> • <i>Encourage only one vehicle crossing per dwelling to ensure the preservation of on street car parking and limit pedestrian conflict points.</i> • <i>Ensure accessways are located to minimise any impact on existing street trees.</i> • <i>Encourage roof forms to reflect the broad forms, pitch and eave detail of roofs that predominate in the neighbourhood.</i> • <i>Ensure fencing and boundary treatments are compatible with the architectural style of the dwelling and the street.</i> • <i>Ensure new development provides an active interface to the public realm to provide passive surveillance and to stimulate street life.</i> • <i>Ensure driveways and hard stand areas do not dominate the frontage of dwellings.</i> <p><i>Objective 3:</i></p> <ul style="list-style-type: none"> • <i>To ensure new development demonstrates best practice environmentally sustainable design.</i> <p><i>Strategies to achieve this objective include:</i></p> <ul style="list-style-type: none"> • <i>Encourage new development to incorporate water sensitive urban design and other environmentally sustainable design initiatives.</i> • <i>Ensure new development is orientated to achieve maximum passive solar access to living areas.</i> • <i>Ensure new dwellings incorporate canopy tree planting in the front and rear setbacks.</i> <p><i>It is policy that, as appropriate (relevant):</i></p> <ul style="list-style-type: none"> • <i>New development should sit harmoniously within the streetscape in terms of scale, proportion and design.</i> • <i>Residential development in or close to activity centres should include appropriate noise attenuation to protect the amenity of residents.</i> • <i>Private open space should not be located within the frontage of new developments unless it is integrated within an apartment complex. New development should use high quality robust building materials.</i> • <i>New development should provide active street frontages and avoid blank walls facing streets.</i> • <i>New development should provide for significant landscaping opportunities within front and side setbacks and between dwellings.</i> • <i>External services and equipment such as plumbing, heating, ventilation, lift over-runs and other plant should be incorporated into the building design and be concealed from public view to minimise amenity impacts on surrounding residential areas.</i> • <i>Waste collection areas should be sited in unobtrusive locations and be adequately screened from the streetscape view.</i> <p><u>Clause 21.10 Transport and Infrastructure</u> <u>Clause 21.10-1 Sustainable Transport</u></p> <p><i>Objective 1</i></p> <ul style="list-style-type: none"> • <i>To improve access to sustainable transport options</i> <p><i>Objective 2</i></p> <ul style="list-style-type: none"> • <i>To develop a variety of sustainable transport options for the movement of people and goods within and through the municipality</i> <p><u>Clause 21.10-3 Car Parking</u> <i>Objective 1</i></p> <ul style="list-style-type: none"> • <i>To ensure car parking areas do not dominate the public realm and are</i> |
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attractive, high amenity spaces that incorporate good passive surveillance.

Clause 21.10-4 - Infrastructure

Objective 1

- *To reduce storm water flows and peak discharges*

Objective 2

- *To protect the community from the impacts of flooding.*

Assessment

The development of 47 dwellings is consistent with the general policy emphasis to encourage infill housing within the activity centres and the 20 minute neighbourhood objective and specifically to encourage higher density residential development in these locations.

Whilst the proposal is of an architectural contemporary design, it reflects the single and double storey built form of the existing housing stock to the west and uses materials including brick that are characteristic to the area.

The proposal encourages sustainable transport options by providing a formal path along the southern boundary linking the existing dwellings to the west to Keilor Central to the east.

The car parking has been carefully designed to allow tree planting within nature strips and within the front setback areas of each ground floor dwelling with all single storey dwellings having the opportunity for additional tree planting within the secluded private open space areas.

In terms of infrastructure, Council's Engineering Department has raised no objections to the development in terms of stormwater or flooding subject to appropriate changes and clarification within the Stormwater report.

Clause 21.07-1 references the Brimbank Housing Strategy *Home and Housed* which was adopted by Council in 2014. This Strategy includes a section on social housing.

Social housing is noted as including indigenous, public and community housing. The current proposal would fall under the definition of community housing which is "*housing delivered through a partnership between State Government and registered housing associations or housing providers. It is usually provided to individuals and families on low to moderate incomes.*"

The Housing Strategy outlines the following ways in which Council will support social housing:

- *Ensure the existing social housing is safeguarded while also encouraging further provision.*
- *Talk to the Office of Housing about the maintenance or replacement of residential buildings in poor condition.*
- *Facilitate the provision of indigenous, public and community housing.*

The strategy also notes that housing affordability is not just about the price of housing but also its location. The subject site is located adjacent to a large shopping centre that includes a medical centre and a variety of food retailers and other services, north of the future Aquatic and Wellness Centre which will provide a variety of health and wellbeing services, and within walking distance of bus and train services. These all

make the site a suitable location for a social housing development.

Clause 22.02 – Environmentally Sustainable Development

This policy complements a range of non-statutory measures aimed at encouraging environmentally sustainable development through energy performance, water resources, indoor environment quality, stormwater management, transport, waste management and urban ecology. The overarching objective is that development should achieve best practice in environmentally sustainable development from the design stage through to construction and operation.

It is policy:

- *To ensure innovative technology, design and processes positively influence the sustainability of all development.*
- *That applications for the types of development listed in Table 1 be accompanied by information which demonstrates how relevant policy objectives will be achieved.*

A Sustainability Management Plan and associated information was submitted and assessed by Council's ESD Officer who was satisfied that the development meets the requirements of the ESD Policy, subject minor recommended changes.

The application has been assessed against the Local Planning Policy Framework and it is considered that the proposed development is consistent with relevant policies contained within this section of the Brimbank Planning Scheme, subject to some required changes.

Zoning and Overlay Provisions

Clause 34.01: Commercial 1 Zone

Purpose

- *To implement the Municipal Planning Strategy and the Planning Policy Framework.*
- *To create vibrant mixed use commercial centres for retail, office, business, entertainment and community uses.*
- *To provide for residential uses at densities complementary to the role and scale of the commercial centre.*

Clause 34.01-8 Decision guidelines

Before deciding on an application, in addition to the decision guidelines in Clause 65, the responsible authority must consider, as appropriate:

General

- *The Municipal Planning Strategy and the Planning Policy Framework.*
- *The interface with adjoining zones, especially the relationship with residential areas.*

Building and works (relevant)

- *The movement of pedestrians and cyclists, and vehicles providing for supplies, waste removal, emergency services and public transport.*
- *The provision of car parking.*
- *The streetscape, including the conservation of buildings, the design of verandahs, access from the street front, protecting active frontages to pedestrian areas, the treatment of the fronts and backs of*

- buildings and their appurtenances, illumination of buildings or their immediate spaces and the landscaping of land adjoining a road.*
- *The storage of rubbish and materials for recycling.*
 - *Defining the responsibility for the maintenance of buildings, landscaping and paved areas.*
 - *Consideration of the overlooking and overshadowing as a result of building or works affecting adjoining land in a General Residential Zone, Neighbourhood Residential Zone, Residential Growth Zone or Township Zone.*
 - *The impact of overshadowing on existing rooftop solar energy systems on dwellings on adjoining lots in a General Residential Zone, Mixed Use Zone, Neighbourhood Residential Zone, Residential Growth Zone or Township Zone.*
 - *The availability of and connection to services.*
 - *The design of buildings to provide for solar access.*

Assessment

The proposal is consistent with the objectives of the Zone, providing a residential development within an established Major Activity Centre.

The car parking provided exceeds the minimum requirements, and a path has been provided creating a connection from the existing dwellings to the west to the shopping centre to the east.

The development is generally well designed including significant fenestration and balconies facing the street.

All dwellings include appropriate areas for the storage of waste to be appropriately screened from the streetscape and a waste management plan can be required as a recommended addition to the plans.

As discussed above, the proposal has support from Council's ESD Officer in terms of environmentally sustainable design including ensuring adequate solar access is provided to dwellings

Due to the single storey nature of the dwellings provided and the setbacks from the western boundary of over 3.0 metres there, will be minimal impact on the adjoining residential properties.

The proposal is considered consistent with the zoning provisions.

Schedule 2 to Clause 43.04: Development Plan Overlay Keilor Downs Plaza Shopping Centre

A permit granted must:

- *Be generally in accordance with the development plan.*
- *Include any conditions or requirements specified in a schedule to this overlay*

Assessment

In terms of the above a Development Plan has been approved under the Overlay Provisions. This identifies the following for the site:

- Future Residential/ Mixed Use
- A Landscape Edge Along the Western Boundary abutting the residential area
- A height of up to 9 metres (3 storey) on the western half of the site and a height up to 18 metres (6 storey) on the eastern half.

The proposal is entirely consistent with the above. Residential is

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| | <p>permitted under the approved Development Plan and the maximum height of two storey is below the maximum permitted on both the western and eastern portions. The secluded private open space is provided along the western boundary over 3.0 metres in depth with the indicative landscaping plan showing canopy tree planting.</p> <p>Particular Provisions <u>Clause 52.20 – Victoria’s Big Building</u></p> <p>Purpose</p> <ul style="list-style-type: none"> • <i>To facilitate the use and development of land for housing projects funded by Victoria’s Big Housing Build program.</i> • <i>To ensure that development does not unreasonably impact on the amenity of adjoining dwellings.</i> <p><u>Clause 52.20-6 – Development Standard for dwellings and buildings</u> <u>Clause 52.20-6 – Development Standard for apartments</u></p> <p>An assessment against the development standards are contained below.</p> <p>It is noted that standard 52.20-6 relates to the single storey dwellings whilst 52.20-7 relates to the double storey walk-up apartments.</p> |
| <p>Clause 52.20 -6: Development Standard for dwellings and buildings (Note – this section relates to all single storey dwellings around the perimeter of the site)</p> | |
| 1 | <p>Infrastructure</p> <ul style="list-style-type: none"> • <i>Development should be connected to reticulated services, including reticulated sewerage, drainage, electricity and gas.</i> • <i>Development should not unreasonably exceed the capacity of utility services and infrastructure, including reticulated services and roads.</i> • <i>In areas where utility services or infrastructure have little or no spare capacity, developments should provide for the upgrading of or mitigation of the impact on services or infrastructure.</i> <p><u>Assessment</u> The design and layout of the site allows for connection to reticulated services, and upgrades where required subject to recommendations by Council’s Engineering Department. The requirements will form part of the recommended changes to the plans.</p> <p>Complies subject to recommended changes to plans</p> |
| 2 | <p>Street Setback</p> <p><i>Walls of buildings should be set back from streets at least the distance specified in Table 1. Porches, pergolas and verandahs that are less than 3.6 metres high and eaves may encroach not more than 2.5 metres into the setbacks of this standard.</i></p> <ul style="list-style-type: none"> • <i>Existing buildings on abutting allotments facing the same street - min. 7m or existing setback of the buildings OR the same distance as the setback of the existing abutting building</i> • <i>No existing buildings on abutting allotments - min. 8m, (RDZ1) or min. 4m (other streets)</i> <p><u>Corner site</u></p> <ul style="list-style-type: none"> • <i>Front street: min. 7m where has abutting existing building OR min. 8m, (RDZ1) or min. 4m (other streets) where has no existing abutting building</i> • <i>Side Street: minimum same as adjoining or 3m, whichever is lesser for front walls. Minimum same as adjoining or 2m, whichever is lesser for side walls</i> • <i>OR the same distance as the setback of the existing abutting building</i> |

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| | | <p><u>Assessment</u></p> <p>There are no dwellings proposed which front existing streets. The side of dwelling G.35 adjoins the new section of Thornhill Drive, with all dwellings fronting the new proposed loop road internal to the site. The sideage of dwelling G.35 has a very limited setback which sits well forward of the front setback of 42 Thornhill Drive (immediate dwelling to the west), however it is noted that there is already a high paling fence located along the common boundary between the two which will minimise the impact.</p> <p>As there are no existing buildings on abutting allotments facing the same street as the front of any of the proposed dwellings, the required setback appears to be 4.0 metres. A variation is proposed between 0.6 metres and 1.9 metres.</p> <p>Given the location of the site is a Commercial 1 Zone, this is considered acceptable. The proposal seeks to create a front setback character on a site which is connected to but removed from the existing street layout and from the existing front setback character of the wider area.</p> <p>The proposal allows for street tree planting, as well as a tree within the front setback of all ground floor dwellings and a car parking space for each dwelling.</p> <p>Given the above and the fact that the approved Development Plan and the Commercial 1 Zone both permits higher density development, the setback is considered acceptable allowing for an efficient site layout for the affordable dwellings.</p> <p>Variation sought and supported</p> |
| 3 | Permeability | <p><i>The site area covered by the pervious surfaces should be at least 20 percent of the site.</i></p> <p><u>Assessment</u></p> <p>The proposal achieves permeability of 45% or 4,355sqm.</p> <p>Complies</p> |
| 4 | Safety | <ul style="list-style-type: none"> • <i>Entrances to dwellings should not be obscured or isolated from the street and internal accessways.</i> • <i>Planting which creates unsafe spaces along streets and accessways should be avoided.</i> • <i>Developments should be designed to provide good lighting, visibility and surveillance of car parks and internal accessways.</i> • <i>Private spaces within developments should be protected from inappropriate use as public thoroughfares.</i> <p><u>Assessment</u></p> <p>All dwelling entrances at ground level are oriented to their new street with good visibility and passive surveillance. Private open space is clearly separated from common areas and accessways.</p> <p>Complies</p> |
| 5 | Access | <ul style="list-style-type: none"> • <i>The width of accessways or car spaces that front existing streets should not exceed:</i> <ul style="list-style-type: none"> - <i>33 per cent of the street frontage, or if the width of the street frontage is less than 20 metres, 40 per cent of the street frontage.</i> - <i>No more than one single-width crossover should be provided for each dwelling fronting a street.</i> • <i>The location of crossovers should maximise the retention of on-street</i> |

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| | | <p><i>car parking spaces.</i></p> <ul style="list-style-type: none"> <i>The number of access points to a road in a Road Zone should be minimised. Developments must provide for access for service, emergency and delivery vehicles.</i> <p><u>Assessment</u> Vehicle access to each dwelling is provided internal to the site, via a new internal road. The new road and road reserve have been assessed by Council's Traffic Engineers who are generally supportive of the layout.</p> <p>Car parking for the central walk-up dwellings is provided within a dedicated rear accessway, ensuring main frontages are not car-dominated and can include significant street trees.</p> <p>Complies</p> |
| 6 | Parking Location | <p><i>Car parking facilities should:</i></p> <ul style="list-style-type: none"> <i>Be reasonably close and convenient to dwellings.</i> <i>Be secure.</i> <i>Be well ventilated if enclosed.</i> <i>Shared accessways or car parks of other dwellings should be located at least 1.5 metres from the windows of habitable rooms.</i> <i>This setback may be reduced to 1 metre where there is a fence at least 1.5 metres high or where window sills are at least 1.4 metres above the accessway.</i> <p><u>Assessment</u> Car parking is convenient to each dwelling, being located within the front setback or off the rear accessway for the walk-up dwellings. No shared car parking is provided within 1.5m of a habitable room window.</p> <p>Complies</p> |
| 7 | Car Parking | <ul style="list-style-type: none"> <i>A minimum 0.6 car spaces should be provided to each dwelling. A minimum 1 car space should be provided to each 4 bedrooms of a residential building.</i> <i>Car parking for other land uses must be to the satisfaction of the responsible authority.</i> <i>Car spaces may be covered or uncovered. If in calculating the number of car parking spaces the result is not a whole number, the required number of car parking spaces is to be rounded down to the nearest whole number greater than 1</i> <p>In terms of the requirements above, this would mean that a total of 28 on-site parking spaces was required. In this instance each dwelling is provided within 1 on-site car parking space for a total of 47 spaces, which provides 19 spaces more than required by the above provisions.</p> <p>In addition this standard includes a number of requirements relating to design accessways, car parking, safety and urban design. These have been considered by internal departments of Council including Traffic Engineers and Urban Design, who have raised no objections subject to minor amendments that will form recommended changes to the plans.</p> <p>Complies subject to recommended changes to plans</p> |
| 8 | Side and Rear Setbacks | <ul style="list-style-type: none"> <i>A new building not on or within 200mm of a boundary to a residential zone should be set back from side or rear boundaries 1 metre, plus 0.3 metres for every metre of height over 3.6 metres up to 6.9 metres, plus 1 metre for every metre of height over 6.9 metres. Diagram 2 details the standard.</i> <i>Sunblinds, verandahs, porches, eaves, fascias, gutters, masonry chimneys, flues, pipes, domestic fuel or water tanks, and heating or</i> |

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| | | <p><i>cooling equipment or other services may encroach not more than 0.5 metres into the setbacks of this standard.</i></p> <ul style="list-style-type: none"> <i>Landings having an area of not more than 2 square metres and less than 1 metre high, stairways, ramps, pergolas, shade sails and carports may encroach into the setbacks of this standard.</i> <p><u>Assessment</u> The single storey dwellings are compliant with side and rear setback requirements to all site boundaries with setbacks from the western boundary being over 3.0 metres.</p> <p>Complies</p> |
| 9 | Walls on Boundaries | <p><i>A new wall constructed on or within 200mm of a side or rear boundary of a lot or a carport constructed on or within 1 metre of a side or rear boundary of lot should not abut the boundary for a length of more than:</i></p> <ul style="list-style-type: none"> <i>10 metres plus 25 per cent of the remaining length of the boundary of an adjoining lot, or</i> <i>Where there are existing or simultaneously constructed walls or carports abutting the boundary on an abutting lot, the length of the existing or simultaneously constructed walls or carports whichever is the greater.</i> <p><u>Assessment</u> No walls are proposed on boundaries.</p> <p>Complies</p> |
| 10 | Daylight to existing windows | <p><i>Buildings opposite an existing habitable room window should provide for a light court to the existing window that has a minimum area of 3 square metres and minimum dimension of 1 metre clear to the sky. The calculation of the area may include land on the abutting lot.</i></p> <p><u>Assessment</u> Dwellings within the proposal are sufficiently setback from existing dwellings beyond the site to the west so as not to impact on their light courts.</p> <p>Complies</p> |
| 11 | North Facing Windows | <p><u>Objective</u> <i>If a north-facing habitable room window of an existing dwelling is within 3 metres of a boundary on an abutting lot, a building should be setback from the boundary 1 metre, plus 0.6 metres for every metre of height over 3.6 metres up to 6.9 metres, plus 1 metre for every metre of height over, for a distance of 3 metres from the edge of each side of the window. A north-facing window is a window with an axis perpendicular to its surface oriented north 20 degrees west to north 30 degrees east.</i></p> <p><u>Assessment</u> There are no existing north facing habitable room windows within 3m of the site boundary.</p> <p>Complies</p> |
| 12 | Overshadowing of Open Space | <p><i>Where sunlight to the secluded private open space of an existing dwelling is reduced, at least 75 per cent, or 40 square metres with minimum dimension of 3 metres, whichever is the lesser area, of the secluded private open space should receive a minimum of five hours of sunlight between 9 am and 3 pm on 22 September.</i></p> <p><u>Assessment</u> The single storey height of perimeter dwellings, and the proposed</p> |

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| | | <p>setbacks of these dwellings from the western boundary ensures no additional shadow is cast by proposed dwellings to surrounding open space areas beyond that already cast by the boundary fences.</p> <p>Complies</p> |
| 13 | Overlooking | <p><i>This standard does not apply to a new habitable room window, balcony, terrace, deck or patio which faces a property boundary where there is a visual barrier at least 1.8 metres high and the floor level of the habitable room, balcony, terrace, deck or patio is less than 0.8 metres above ground level at the boundary..</i></p> <p><u>Assessment</u> Only single storey dwellings are proposed abutting the residential properties to the west, with a 1.8 metre fence shown along the western boundary. This will ensure no unreasonable overlooking occurs.</p> <p>Complies</p> |
| 14 | Noise Impacts | <ul style="list-style-type: none"> • <i>Noise sources, such as mechanical plant, should not be located near bedrooms of immediately adjacent existing dwellings.</i> • <i>Noise sensitive rooms and secluded private open spaces of new dwellings and residential buildings should take account of noise sources on immediately adjacent properties.</i> • <i>Dwellings and residential buildings close to busy roads, railway lines or industry should be designed to limit noise levels in habitable rooms.</i> <p><u>Assessment</u> Noise sources including air conditioning units are not located near existing dwellings and it is not anticipated that the new dwellings will create unreasonable noise impacts to their neighbours.</p> <p>However it is noted that the eastern boundary of the site abuts the Shopping Centre car park. An acoustic fence should be provided to mitigate any noise impacts and this should form a recommended change to the plans.</p> <p>Complies subject to recommended changes to plans</p> |
| 15 | Daylight to New Windows | <p><i>A window in a habitable room should be located to face:</i></p> <ul style="list-style-type: none"> • <i>An outdoor space clear to the sky or a light court with a minimum area of 3 square metres and minimum dimension of 1 metre clear to the sky, not including land on an abutting lot, or</i> • <i>A verandah provided it is open for at least one third of its perimeter, or</i> • <i>A carport provided it has two or more open sides and is open for at least one third of its perimeter.</i> <p><u>Assessment</u> New windows are located and oriented to meet these requirements.</p> <p>Complies</p> |
| 16 | Private Open Space | <p><i>A dwelling (other than an apartment) should have private open space consisting of:</i></p> <ul style="list-style-type: none"> • <i>An area of secluded private open space with a minimum area of 25 square metres, a minimum dimension of 3 metres and convenient access from a living room; or</i> • <i>A balcony of 8 square metres with a minimum width of 1.6 metres and convenient access from a living room; or</i> |

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| | | <ul style="list-style-type: none"> • <i>A roof-top area of 10 square metres with a minimum width of 2 metres and convenient access from a living room.</i> <p><i>Secluded private open space may be located in the front setback if it is no more than 30% of the street frontage</i></p> <p><u>Assessment</u> All single storey dwellings have private open space areas which exceed 25sqm, which is located in the rear setback of each dwelling.</p> <p>Complies</p> |
| 17 | Solar Access to Open Space | <ul style="list-style-type: none"> • The private open space should be located on the north side of the dwelling if appropriate. • The southern boundary of secluded private open space should be set back from any wall on the north of the space at least $(2 + 0.9h)$ metres, where 'h' is the height of the wall. <p><u>Assessment</u> No south-facing private open space areas are proposed.</p> <p>Complies</p> |
| 18 | Storage | <ul style="list-style-type: none"> • A dwelling should have convenient access to at least 6 cubic metres of externally accessible, secure storage space. <p><u>Assessment</u> Each Type B and C dwelling lot accommodates 6 cubic metres of storage space. A variation is required in relation to the Type A dwellings given 4 cubic metres of external storage space is provided. This should be increased to 6 cubic metres as there is sufficient room on each site for this to be accommodated.</p> <p>Complies subject to recommended changes to plans</p> |
| 19 | Front Fence | <p><i>A front fence within 3 metres of a street should not exceed a maximum height of</i></p> <ul style="list-style-type: none"> • <i>2 metres for streets in a Road Zone, Category 1, and</i> • <i>1.5 metres in other streets or where secluded private open space is proposed within the front setback, the front fence may reach a height of up to 1.8 metres for not more than 30% of the length of the boundary.</i> <p><u>Assessment</u> A combination of treatments are proposed to the street. These include open areas, low walls and landscaped areas. No high front fences are proposed.</p> <p>Complies</p> |
| 20 | Common Property | <p><i>Developments should clearly delineate public, communal and private areas. Common property, where provided, should be functional and capable of efficient management</i></p> <p><u>Assessment</u> Public and private space is clearly delineated.</p> <p>Complies</p> |
| 21 | Site Service | <ul style="list-style-type: none"> • <i>Design should allow sufficient space for services, bins and recycling enclosures, secure mailboxes with convenient access.</i> <p>Each dwelling lot is of sufficient size to accommodate bins, services and a mailbox.</p> |

| | | Complies |
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| Clause 52.20 -7: Development Standard for Apartments (Note – this section relates to the one-bedroom dwellings located within the double storey built form central to the site) | | |
| 1 | Energy Efficiency | <ul style="list-style-type: none"> • <i>Buildings should be:</i> <ul style="list-style-type: none"> - <i>Oriented to make appropriate use of solar energy.</i> - <i>Sited and designed to ensure that the energy efficiency of existing dwellings on adjoining lots is not unreasonably reduced.</i> - <i>Sited and designed to ensure that the performance of existing rooftop solar energy systems on dwellings on adjoining lots in a General Residential Zone, Neighbourhood Residential Zone or Township Zone are not unreasonably reduced. The existing rooftop solar energy system must exist at the date the application is lodged.</i> • <i>Living areas and private open space should be located on the north side of the development, if practicable.</i> • <i>Developments should be designed so that solar access to north-facing windows is optimised.</i> • <i>Dwellings located in a climate zone identified in Table 4 should not exceed the maximum NatHERS annual cooling load.</i> <p><u>Assessment</u> Council's ESD Officer has reviewed the information and is generally satisfied with the sustainability information provided subject to recommendations that should form proposed changes to the Sustainability Management Plan (SMP). Walk-up dwellings are oriented east-west to maximise energy efficiency and solar access. All dwellings have been designed to achieve a minimum 7.5 Star NatHERS score. The proposal will not impact energy efficiency of existing surrounding dwellings.</p> <p>Complies subject to recommended changes to the SMP</p> |
| 2 | Communal Open Space | <p><i>Developments with 40 or more dwellings should provide a minimum area of communal open space of 2.5 square metres per dwelling or 250 square metres, whichever is lesser</i></p> <p><u>Assessment</u> A total of 24 dwellings in the walk-up configuration are proposed.</p> <p>N/A</p> |
| 3 | Solar access to communal outdoor open space | <p><i>The communal outdoor open space should be located on the north side of a building, if appropriate. At least 50 per cent or 125 square metres, whichever is the lesser, of the primary communal outdoor open space should receive a minimum of two hours of sunlight between 9am and 3pm on 21</i></p> <p><u>Assessment</u> No communal open space is proposed or required.</p> <p>N/A</p> |
| 4 | Deep Soil Areas and Canopy Trees | <p><u>Objective</u> <i>The landscape layout and design should:</i></p> <ul style="list-style-type: none"> • <i>Be responsive to the site context.</i> • <i>Consider landscaping opportunities to reduce heat absorption such as green walls, green roofs and roof top gardens and improve on-site storm water infiltration.</i> • <i>Maximise deep soil areas for planting of canopy trees.</i> • <i>Integrate planting and water management.</i> |

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| | | <ul style="list-style-type: none"> • <i>Developments should provide the deep soil areas and canopy trees specified in the Table 5.</i> <p><u>Assessment</u> Canopy tree planting opportunities are provided throughout the development.</p> <p>Complies</p> |
| 5 | Integrated Water and Storm Water Management | <ul style="list-style-type: none"> • <i>Buildings should be connected to a non-potable dual pipe reticulated water supply, where available from the water authority.</i> • <i>The stormwater management system should be:</i> <ul style="list-style-type: none"> - <i>Designed to meet the current best practice performance objectives for stormwater quality as contained in the Urban Stormwater - Best Practice Environmental Management Guidelines (Victorian Stormwater Committee, 1999).</i> - <i>Designed to maximise infiltration of stormwater, water and drainage of residual flows into permeable surfaces, tree pits and treatment areas.</i> <p><u>Assessment</u> Council's Drainage Engineer has assessed the proposal and their recommendations will form recommended changes to the Stormwater Management Plan.</p> <p>Complies subject to recommended changes to the Stormwater Management Plan</p> |
| 6 | Building Setback | <ul style="list-style-type: none"> • <i>The built form of the development should respect the existing urban context and respond to the features of the site.</i> • <i>Buildings should be set back from side and rear boundaries, and other buildings within the site to:</i> <ul style="list-style-type: none"> - <i>Ensure adequate daylight into new habitable room windows.</i> - <i>Avoid direct views into habitable room windows and private open space of new and existing dwellings.</i> - <i>Developments should avoid relying on screening to reduce views. Provide an outlook from dwellings that creates a reasonable visual connection to the external environment.</i> <p><u>Assessment</u> The walk-up apartments have been designed as two storey with materials complementing the surrounding area. They have been separated from the single storey built form by roadways, which also assist in ensuring that they avoid direct views into habitable room windows and private open space of other dwellings.</p> <p>Complies</p> |
| 7 | Noise Impacts | <p><i>Noise sources, such as mechanical plant should not be located near bedrooms of immediately adjacent existing dwellings. The layout of new dwellings and buildings should minimise noise transmission within the site. Noise sensitive rooms (such as living areas and bedrooms) should be located to avoid noise impacts from mechanical plants, lifts, building services, non-residential uses, car parking, communal areas and other dwellings. New dwellings should be designed and constructed to include acoustic attenuation measures to reduce noise levels from off-site noise sources.</i></p> <p><u>Assessment</u> Air conditioning units are appropriately located to minimise noise impacts.</p> <p>Complies</p> |

| 8 | Accessibility | <p><i>At least 50 per cent of dwellings should have:</i></p> <ul style="list-style-type: none"> <i>A clear opening width of at least 850mm at the entrance to the dwelling and main bedroom.</i> <i>A clear path with a minimum width of 1.2 metres that connects the dwelling entrance to the main bedroom, an adaptable bathroom and the living area.</i> <i>A main bedroom with access to an adaptable bathroom.</i> <i>At least one adaptable bathroom that meets all of the requirements of either Design A or Design B specified in Table 7.</i> <p><u>Assessment</u> All ground floor walk-up units (total 12 of 24, or 50%) have been designed to achieve accessibility requirements.</p> <p>Complies</p> | | | | | | | | | | | | |
|------------------------------|--------------------------------|--|---------------|--------------|-------------------|------------------------------|-----------------|------------|--------------------|-----------------|----------|----------------------------|------------------|------------|
| 9 | Building Entry and Circulation | <p><i>Entries to dwellings and buildings should:</i></p> <ul style="list-style-type: none"> <i>Be visible and easily identifiable.</i> <i>Provide shelter, a sense of personal address and a transitional space around the entry</i> <p><u>Assessment</u> Entry to walk-up dwellings provides a central entry lobby with weather protection for both the ground and first floor dwellings.</p> <p>Complies</p> | | | | | | | | | | | | |
| 10 | Private Open Space | <p>A dwelling should have POS consisting of:</p> <ul style="list-style-type: none"> <i>25 sqm with a minimum dimension of 3m at NGL or</i> <i>15 sqm with a minimum dimension of 3m at podium level, or,</i> <i>A balcony as per Table 8</i> <table border="1" data-bbox="496 1167 1307 1357"> <thead> <tr> <th>Dwelling type</th> <th>Minimum area</th> <th>Minimum dimension</th> </tr> </thead> <tbody> <tr> <td>Studio or 1 bedroom dwelling</td> <td>8 square metres</td> <td>1.8 metres</td> </tr> <tr> <td>2 bedroom dwelling</td> <td>8 square metres</td> <td>2 metres</td> </tr> <tr> <td>3 or more bedroom dwelling</td> <td>12 square metres</td> <td>2.4 metres</td> </tr> </tbody> </table> <ul style="list-style-type: none"> <i>A roof-top area of 10 square metres with a minimum dimension of 2 metres and convenient access from a living room.</i> <p><u>Assessment</u> Whilst provided with 3 metre dimensions, the ground floor type D dwellings have the provision of between 13 and 19.4sqm at ground floor level, requiring a variation from the requirement of 25sqm. Given the size of these dwellings, the fact they only contain one bedroom and the fact that the majority of other dwellings within the development exceed the private open space requirements, this variation is considered reasonable.</p> <p>First floor balconies are at least 8sqm however they are not dimensioned and it appears that some might be less than 1.8m in depth, however this could clarified with changes to the plans.</p> <p>Variation sought for ground level units – but considered reasonable Upper level - complies subject to recommended changes to the plans</p> | Dwelling type | Minimum area | Minimum dimension | Studio or 1 bedroom dwelling | 8 square metres | 1.8 metres | 2 bedroom dwelling | 8 square metres | 2 metres | 3 or more bedroom dwelling | 12 square metres | 2.4 metres |
| Dwelling type | Minimum area | Minimum dimension | | | | | | | | | | | | |
| Studio or 1 bedroom dwelling | 8 square metres | 1.8 metres | | | | | | | | | | | | |
| 2 bedroom dwelling | 8 square metres | 2 metres | | | | | | | | | | | | |
| 3 or more bedroom dwelling | 12 square metres | 2.4 metres | | | | | | | | | | | | |
| 11 | Storage | <ul style="list-style-type: none"> <i>Dwellings should have usable and convenient internal and external storage space, as per the requirements of Table 9.</i> | | | | | | | | | | | | |

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| | | <p><u>Assessment</u> Walk-up dwellings are provided with 6 cubic metres of internal storage and 4 cubic metres of external storage within a secure enclosure in the shared lobby/ stair area.</p> <p>Complies</p> |
| 12 | Waste And Recycling | <ul style="list-style-type: none"> • <i>Dwellings should include dedicated waste areas for waste and recycling which are adequate size, waterproof, integrated into the development, ventilated, and accessible to people with limited mobility.</i> <p><u>Assessment</u> A shared enclosed bin area is provided alongside the car parking to each set of four walk-up dwellings.</p> <p>Complies</p> |
| 13 | Functional Layout Plan | <ul style="list-style-type: none"> • <i>Main bedrooms should be 3 x 3.4m, and other bedrooms 3 x 3m, in addition to a wardrobe.</i> • <i>Living areas should have a minimum width of 3.3m and minimum size of 10sqm for studio and one bedroom dwellings, and a minimum width of 3.6m and minimum size of 12sqm for two or more bedroom dwellings.</i> <p><u>Assessment</u> The bedrooms meet the minimum requirements. All living areas within the walk-up dwellings have an area of at least 13sqm overall which is in excess of the area requirement, however they only have a minimum dimension of 3.2m instead of the 3.3m specified under this standard.</p> <p>The slightly reduced depth of living areas is considered reasonable given the small variation proposed, the generous widths, overall size, and the fact these are small one bedroom dwellings.</p> <p>Variation sought and supported</p> |
| 14 | Room Depth | <ul style="list-style-type: none"> • <i>Single aspect habitable rooms should not exceed a room depth of 2.5 times the ceiling height.</i> • <i>The depth of a single aspect, open plan, habitable room may be increased to 9 metres if all the following requirements are met:</i> <ul style="list-style-type: none"> - <i>The room combines the living area, dining area and kitchen.</i> - <i>The kitchen is located furthest from the window.</i> - <i>The ceiling height is at least 2.7 metres measured from finished floor level to finished ceiling level. This excludes where services are provided above the kitchen.</i> • <i>The room depth should be measured from the external surface of the habitable room window to the rear wall of the room</i> <p><u>Assessment</u> Single aspect habitable rooms do not exceed 6m in depth.</p> <p>Complies</p> |
| 15 | Windows | <ul style="list-style-type: none"> • <i>Habitable rooms should have a window in an external wall of the building.</i> • <i>A window may provide daylight to a bedroom from a smaller secondary area within the bedroom where the window is clear to the sky. The secondary area should be:</i> <ul style="list-style-type: none"> - <i>A minimum width of 1.2 metres.</i> - <i>A maximum depth of 1.5 times the width, measured from the external surface of the window.</i> |

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| | | <p><u>Assessment</u> All habitable room windows meet requirements. No windows from smaller secondary areas are proposed.</p> <p>Complies</p> |
| 16 | Natural Ventilation | <ul style="list-style-type: none"> At least 40% of dwellings should provide a breeze path of between 5 - 18m with ventilation openings of approximately the same area on different orientations of the dwelling. <p>All dwellings achieve a compliant breeze path.</p> <p>Complies</p> |
| 17 | Integration with the Street | <ul style="list-style-type: none"> Developments should provide adequate vehicle and pedestrian links that maintain or enhance local accessibility. Development should be oriented to front existing and proposed streets. High fencing in front of dwellings should be avoided if practicable Development next to existing public open space should be laid out to complement the open space. <p>Walk-up dwellings are oriented to the front street being the main internal loop road, with car parking located to the rear via laneway access.</p> <p>Whilst this is the case there are concerns that the secluded private open space facing the internal road will be fenced. Full details of the fences should be requested as changes to the plans to include 25% opening to provide oblique views to the street whilst maintaining privacy.</p> <p>Complies subject to conditions</p> |
| 18 | Native Vegetation Removal | <p>Before the removal, destruction or lopping of native vegetation outside the levy area:</p> <ul style="list-style-type: none"> Information about the native vegetation in accordance with the application requirements 1, 5 and 9 in Table 4 of the Guidelines for removal, destruction or lopping of native vegetation (Department of Environment, Land, Water and Planning, December 2017) must be provided to the satisfaction of the Secretary to the Department Environment, Land, Water and Planning (as constituted under Part 2 of the Conservation, Forests and Lands Act 1987). The biodiversity impacts from the native vegetation must be offset in accordance with the Guidelines for removal, destruction or lopping of native vegetation (Department of Environment, Land, Water and Planning, December 2017). Evidence that the required offset has been secured must be provided to the satisfaction of the Secretary to the Department of Environment, Land, Water and Planning <p>Planning Permit No. P637/2018 was issued on 20 March 2019 and allows for removal of native vegetation from the site. The native vegetation in this instance is native grasses. Council's Environment Department have confirmed the corresponding offsets have been finalised and are satisfactory.</p> <p>Complies</p> |
| Conclusion: | | <p>A full and detailed assessment of the application has been undertaken and it is concluded that the policies within the Planning Scheme show good support for the proposal.</p> <p>In particular, the assessment against Clause 52.20 shows that there is</p> |

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| | <p>good compliance with the various standards, subject to some minor changes to the plans.</p> <p>All amenity standards relating to the adjoining residential properties to the west are met or exceeded and all standards relating to the internal amenity of the single storey dwellings are met. The car parking provided on site also significantly exceeds the minimum required.</p> <p>Whilst small variations to the standards are proposed for the two storey dwellings relating to open space areas and internal dimensions of the living rooms, these are one bedroom units and in general they are seen to provide a good level of internal amenity. Additionally they are located within the Activity Centre and these variations will not compromise the amenity of existing dwellings in the area.</p> <p>Based on this assessment, it is recommended that Council:</p> <ol style="list-style-type: none">a. Provides feedback to the proponent of the development at 21A Copernicus Way, Keilor Downs, to advise that Council has undertaken an assessment of the proposed development of the land for 47 social housing dwellings against Clause 52.20 of the Brimbank Planning Scheme and has found that the development complies with the requirements, subject to the recommended changes at Attachment 5 to this report.b. Writes to the Minister for Energy, Environment and Climate Change, the Hon. Lily D'Ambrosio MP and the Minister for Planning, the Hon. Richard Wynne MP, to advise that Council has provided the above feedback. |
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Recommended changes to plans and documentation:

1. The following changes to the plans are required:
 - a) The 1.8 metre high fence abutting the eastern boundary to be noted as an acoustic fence designed by a suitably qualified acoustic engineer to ensure that the private open space areas are protected from vehicle noise in the car park of the shopping centre.
 - b) Full details of the fences enclosing the secluded private open space of the ground floor dwellings on type D to include 25% openings/transparency.
 - c) A cross-section of the road/footpaths showing the proposed pits and underground services in relation to the proposed trees to ensure that sufficient trees can be accommodated.
 - d) A minimum of 6 cubic metres of externally accessible storage to be provided for dwelling type A.
 - e) The bathroom windows shown on the elevations for dwelling type A are to be shown on the floor plans.
 - f) Full details of the pocket park including any street furniture/equipment proposed.
 - g) Corner properties provided with splays in accordance with Council's subdivision standards and guidelines.
 - h) Footpaths to be shown 90 degrees, across the extended driveways.
 - i) Radii on the inside of the bends to be increased.
 - j) End car parking spaces adjacent to the footpath to provide buffer/separator between the car space and the footpath.
 - k) Vehicle crossover splays shown to Council's current standards with 1200mm splays.
 - l) Provision of a detailed landscape plan that incorporates any changes required to the plans noted above, along with provision of additional landscaping and canopy trees along the central laneway.
 - m) Details of on-site stormwater drainage retention/detention system/s that are designed by a qualified Engineer.
 - n) Balconies to the upper level dwellings to be fully dimensioned, with the minimum dimensions to be 1.8m.
2. A revised stormwater management plan that includes:
 - a) An outfall drain constructed through to the front portion of the site to be connected to Melbourne Water's drain via Council's pit or:
 - b) The existing Council drainage along the western boundary of the subject site to be upsized up to Melbourne Water's drain on Copernicus Way to the satisfaction of Council's Engineering Department.
3. A revised Sustainability Management Plan to include the following:
 - a) Thermal performance rating
 - b) Extent of double glazing

- c) Stormwater treatment devices
 - d) Visitor bicycle parking
 - e) A note stating all windows can be locked in an open position
 - f) A skylight for all bathrooms without windows
 - g) For Dwelling Type C, an operable fanlight/top light over the front door (or a secure screen door) to allow effective cross-ventilation
 - h) Details of shading devices for all habitable room windows facing the north, east and west.
4. Provision of a Waste Management Plan that provides details of regular garbage, recycling and green waste collection service to each of the dwellings on the subject land, including information regarding the type of bins, type and size of trucks, means of accessing bins and frequency of collection.

APPENDIX C

COMMUNITY FEEDBACK

| Item | Comment |
|------|--|
| 1. | <p data-bbox="248 142 495 172">Good morning Phil</p> <p data-bbox="248 221 2107 331">My name is [redacted], I have been living in Keilor Downs with my wife and two young children for 6 years and have been a resident of Brimbank for over 25 years. I am writing to you to express my opposition to the Bapcare housing development which is being proposed on the land between Copernicus Way and Thornhill Drive. Adjacent to what us locals simply know as Keilor Downs Plaza.</p> <p data-bbox="248 381 1285 411">Thanks for walking the local community through the proposal on Tuesday night.</p> <p data-bbox="248 461 2119 571">There are many concerns with the proposal that I know many of my fellow community members shared on the Zoom call. I'd like to bring my concerns to you via email and I trust you'll share these concerns with the State Government, in particular the Minister for Planning, Minister for Housing and Minister for Child Protection, Mr Richard Wynne.</p> <p data-bbox="248 620 2119 802">To begin, yesterday morning, a fellow Keilor Downs resident shared a link to a Facebook post which outlined the proposal. It was quickly shared amongst the local community. For many, like myself, this was the first time hearing or reading about it. As part of learning this, we also learnt that there was a community information session being held on the same day (Tuesday night) hosted by Bapcare and yourselves, Urbis. As you would understand by now, many of those who reside in Keilor Downs are elderly, have English as a second language, or would simply not regularly be on the internet. Many would certainly not have this information at hand.</p> <p data-bbox="248 852 2063 962">Approximately 40 local residents joined the Zoom call last night to raise their concerns. The opposition to the proposal, as you noted on the call, was unanimous. All local residents in agreement with each other. I will not speak on behalf of the community, however I am tabling my concerns in which I know many share.</p> <ul data-bbox="297 1011 2119 1430" style="list-style-type: none"> <li data-bbox="297 1011 2119 1074">• With other new housing builds in progress, this will absolutely add to traffic congestion. Bapcare suggested this has been modelled, but without those completed builds, how can we be certain this won't impact the community? <li data-bbox="297 1086 2119 1149">• Parking - where will the proposed new residents park? With 47 new dwellings and at least 130+ new residents, will Thornhill Drive turn into a car park? Will the shopping centre car park continually be full? Will there be a sea of cars parked on the vacant land? <li data-bbox="297 1161 2119 1343">• There are major concerns around the consultation process, which seems to have many flaws. Firstly, the small permit signage has been hidden away in an area which isn't often frequented by foot and inaccessible by car. There has been zero consultation with local residents up until this point. Bapcare indicated on Tuesday night's call that Brimbank Council has been aware of this development since the beginning of the year. We'd like clarification on that. We as a group consulted Cr Maria Kerr of Brimbank who explicitly stated that the council had not been aware of this proposal until very recently. <li data-bbox="297 1356 2119 1430">• It was also mentioned by Bapcare that a flyer drop had been conducted, targeted at residents who live within 150m of the site. This would cover barely any houses, if at all, as one side is the plaza, another is the new aquatics centre, another is vacant land and finally |

the other is residents in Thornhill Drive, Milas Ct and Packard Street. Some of which have not received any communication, others which noted a letter in the mail from the council a week ago. This in particular has angered residents.

- In addition to this, for many of our residents in Keilor Downs, English is their second language. Poor communication combined with inadequate time, particularly for these residents, has affected the chance to review and respond to the proposal.
- Bapcare outlined that they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, where the overwhelming majority indicated Keilor Downs as their preference. We understand that Bapcare have owned the large parcel of land between Copernicus Way and Thornhill Drive for the past 7-8 years. We request to obtain the survey results, to ensure Bapcare owning a large parcel of land in Keilor Downs, where their survey respondents preferred Keilor Downs, is only a coincidence and not corrupt, whereby the recent Victorian Government announcement of the \$150m housing grant has changed the decision from a retirement village to an affordable housing development. Retirement villages and aged care facilities in our suburb are - and always will be welcome.
- We also understand that there are many vacant commission houses in the area already which further highlights the fact that this development is not needed.
- There are concerns around infrastructure, both current and what would be the future. How can we be comfortable that infrastructure requirements will be met?
- Policing and police resourcing is also of concern. In the West, we have 1 police officer for every 1600 residents. In the east, there is 1 police officer for every 800 residents. In our area of Keilor Downs, this will put further strain on resources, with the continued population growth.
- In relation to the above, safety for our community and our residents is of utmost importance. The proposal to build this housing development in between two early learning centres and next to a shopping centre, where residents frequent at night, is concerning.
- Mental health support for our local residents is required now, more than ever. Mental health issues within our community continue to not be addressed. An increase in vulnerable residents will put further pressure on our mental health system.
- Our childcare and kindergarten centres are and will continue to be overloaded. We have a shortage of carers in the area, this will make the shortage worse.

Residents of Keilor Downs are proud to live here. Many have built houses and have never sold. We want to ensure our suburb can prosper, that the character of our suburb does not change and that residents can live safely, in harmony.

Thank you for taking the time to read through this and please do get in contact if you require any clarification.

2. I read with disappointment the proposed development ear marked for the empty lot next to Keilor plaza. I've lived in the area since 1998 and the first few years watched the value of my property ever so slowly creep up in value whilst the rest of the state boomed. Only recently the value of my property has increased in increments worthy of talking about and then this proposal is put forth. The area has many issues with public transport, drugs, congestion, theft and evidently some homeliness around the plaza. Is the Keilor Downs police station not one of the busiest in the region. We saw how Covid effected the housing commissions in Flemington. At one stage Keilor Downs was the epi centre of the

early Covid out breaks. Keilor Downs plaza has had many tier one and tier two out breaks. Keilor Downs was in the news week after week. Imagine the impact if we had another 47 dwellings in that area. What is their aim? Are the authorities intent on making Keilor Downs a true ghetto? Are they intent on reducing the value of property? Are they intent on pushing good law abiding people out. What is the point? I sternly object to the development regardless of it's proposed good nature. There are plenty of other areas that are developing on the out skirts without the need of impacting existing house and property prices. I ask you, how would you feel if the authorities pop this in your neighbourhood? How will you react? What would you do?

My parents also live in the area and we have many friends living close by. If the authorities persist, I will not sit idle. I will not sit idle as mine and many other residents hard earned goes down the drain to make way for a proposal that has many other options.

3. We (read: the respondents identified at Annex A of this document) are writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Baptcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. We live in Keilor Downs, many with young families and many who have been residents of Brimbank for over 20 years. Of this community there are those in various areas of employment, including professionals in the Health and Community Services sector with extensive experience and support the awareness of the needs of communities that the project would target.

There are several key planning issues with the proposal we request consideration of and accordingly an appropriate response to. additionally supported by an exhaustive list on non-compliant and poorly considered planning solutions identified at Annex B of this document.

Lack of Community Consultation and Culturally inclusive practice.

We were informed about this proposal recently from our neighbours who live within 150 metres of the proposed construction, or via viewing of the obscurely located planning advice sign. Subsequently, a community consultation meeting about the proposal was conducted by Baptcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project (estimated at no more than 15 residents), as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area which isn't often frequented by foot and is not accessible by car, and is additionally over 150m from the construction location. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents and is also non-compliant to Clause 52.20 of which this development's proposal is based upon.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English, and additionally, no alternative language service is available to understand the planning information. Some residents were able to attend the recent consultation meeting with Baptcare via Zoom, however measures were

not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project whom are not familiar with technology services. It was evident from the meeting that this demographic was not present, and their voice continues to not have been heard.

In addition to this, there has been no consideration of the COVID-19 restrictions that are placed on the communities in Melbourne and the subsequent difficulty in access to information relating to this development; being that the only publicly available information is the obscurely positioned sign. This is further evidenced by the community itself forming this document, of it's own volition, with almost all residents being made aware via word of mouth.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above. To date, this information remains unavailable, unclear and unverified of fact.

We understand that Baptcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Baptcare was previously planning to build a retirement village aligned with the longer-term demographic

changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Baptistcare have changed their plan of building a retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected. This is further supported by the significant lack of community consultation.

Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Baptistcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

We direct you to Annex A and Annex B of this document for the persons who oppose this development and further evidence of the non-compliance to Clause 52.20.

Annex A - Individuals who oppose this development

Please find at the following link over 1000 local residents who are opposed to this development. Each of these individuals is to be considered as a formal respondent to this objection and as such included in Baptistcare's formal review paper than is supplied to the State Government or its Representatives in accordance with Clause 52.20 (Department of Health and Human Services or the Director of Housing)

Current petition for rejection: https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilor-downs?fbclid=IwAR10U3M1B4S21a_Z1SfZUc2lq1zQYOYb1U3GuFPJfU0q0-Zw3V0P-Zmswiw

Annex B - Technical Assessment of Baptcare's Planning Reports

This assessment is generated from the following publically available reports:

<https://www.baptcare.org.au/services/housing/affordable-housing>

General Concerns:

1. This development is for 47 dwelling of unknown inhabitant numbers, however, it can be assumed that approximately 150 people will occupy this area. Given the significant numbers of inhabitants and dwellings being built, it is inappropriate that the distribution of advice relating to this build was only provided to a 150m radius of the build location. [REDACTED]. There will be significant impact to the surrounding area, including schools, public facilities (parks etc), community facilities (gyms/pools), retail and shopping facilities, of which the Keilor Downs community regularly utilise. The majority of the user community will remain unaware of this development. [REDACTED]
 - a. This is inappropriate and requested to be addressed.
2. Given the type of dwellings and number, this will no doubt have a significant impact on the house values within a far greater radius than 150m. Initial assessments would indicate the impact to be to no less than 3km surrounding the development. This has not been addressed in the reports and consideration has not been provided to this effect.
 - a. This is inappropriate and must be addressed for the impacted community.
3. The general Social Housing policy of 'One in Nine' is a method of disbursing social housing tenants throughout the community. This is in recognition of best practice australia wide, being that people experiencing disadvantage are far more likely to move along the housing continuum and out of disadvantage when they are part of a socially diverse community: rather than collate the disadvantaged community together in a complex that, over time, will only erode and decay into another block of social housing 'flats' like those already existing around areas of Melbourne. Additionally, the City's own policy, requires any development not subject future occupants to undesirable levels of disturbance and/or nuisance.
4. In addition to para 3. This development will house disadvantaged individuals in a single location further putting pressure on community well being.
 - a. This is non-compliant with Clause 21.03-1.
5. Given the impact of social housing on local emergency services, and the significant number of new dwellings being built, there has been no review or consideration on the demand for local emergency services.

- a. This is a significant oversight.
- 6. The location of the development is in a Commercial Zone 1.
 - a. This is non-compliant inconsistent with the normal General Residential or Residential Growth Zone requirements to produce high density dwellings (ref Clause 21.02)

Town Planning Report Concerns:

1. The development of 47 dwellings and estimated 150 inhabitants is likely to result in no less than approximately 60 cars (based on unit distributions). A single car park appears to be poorly assessed, despite it passing Clause 52.20 basic requirements.
2. The planning report notes that this project is developed adjacent to a proposed aged care facility (future). This appears to be inconsistent and provides no assessment of the future transport requirements for the land parcel.
3. Clause 15.01-2S: Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.
 - a. **Non-compliant.** Property values will be significantly impacted. The proposed dwellings are inconsistent with all properties in the local area (proposed are high density - existing are not high density). incomplete consideration of parking requirements (only 47 spaces provided, well below assessed inhabitant requirements).
4. Clause 15.01-5S: Pattern of local urban structure and subdivision. Heritage values and built form that reflect community identity.
 - a. **Non-compliant.** There has been no consideration of the local housing representation which have existed for over 50 years. The new development is inconsistent in size/look/feel of the entire suburb.
5. Clause 21.02-3: Apply the Commercial 1 Zone to facilitate retail uses and mixed use development consistent with the primary purpose of the zone.
 - a. **Non-compliant.** This development is only residential in purpose. There is zero foreseeable consideration for this clause in the development. It has not been addressed.
6. Clause 21.04: Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.
 - a. **Non-compliant.** The significance of moving from large parcel property of single dwellings immediately to high density dwellings is inconsistent.
7. Section 6.1: These statements are inconsistent with the requirements of Commercial Zone 1 and do not appear to be logical. Further detail and a re-write of the presented statements is essential.
 - a. **Non-Compliant.** There is no logic to the proposed project achieving any of the requirements of this Commercial Zone 1 requirements.
8. Section 6.3: Incorrectly states that this site is not subject to the Special Building Overlay.
 - a. **Non-Compliant.** All Land data states clearly that this site is subject to DCPO - Development Contributions Plan Overlay - Schedule 2, DPO - Development Plan Overlay - Schedule 2, SBO - Special Building Overlay. Significant oversight on the planning report.
9. Section 6.5: Car parking assessment has been poorly conducted as previously stated throughout this correspondence.

10. Section 7.1: Brimbank Planning Policy Framework assessments: There is no assessment of the Keilor Downs Urban Design Framework document.
 - a. **This appears to be a significant oversight.**
11. Section 7.2: Land use. The statements here are inconsistent with the Commercial Zone 1 framework as previously explained in General Concerns 6. The large scale of proposed density may be appropriate for the proximity to the shopping area, but it is not consistent with a smooth transition between the low density dwellings immediately adjacent to the area.
 - a. **This appears to be a significant oversight.**
12. Section 7.8: As previously stated throughout this Correspondence, the stated allocation of parking is inconsistent and appears to be poorly calculated. This will undoubtedly result in additional parking outflows into the general residential area.
13. General: Of the Town Planning Report, there is a significant non-compliance that has been observed. From Clause 52.20-04: Consultation requirements Before the use or development commences: Public consultation, and consultation with the relevant municipal council, must be undertaken. A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to must be prepared to the satisfaction of the responsible authority
 - a. **Non-Compliant.** Public information sharing appears to have been poorly conducted, with sharing of relevant data and planning information to the community of keilor downs being assessed as significantly inappropriate. There has been little effort to share information with only a 150m radius of residential sites being advised of such a large build with implications to the wider community being ignored. The majority of the community has only been able to find the relevant information via the physical standing advice board at the site. Noting the impacts of COVID-19 and the relevant restrictions, this can only be reviewed as poorly considered and completely void of community impact assessment.

Transport Impact Assessment Concerns:

Parking assessments and driving assessments from the annexes of the document (by Onemilegrid). These parking diagrams show a barely achievable parking assessment, additionally is of note the 'impact' to the internal garage space with each vehicle diagram showing that the standard vehicle diagrams cannot fit within the garage. This is not consistent or appropriate with a reasonable assessment of parking conditions. Entry has not been considered. The presented turning radii do not appear to be achievable (specifically the 'red' vehicle in the diagram at Figure 1)

- a. **This is inappropriate and inconsiderate, additionally it can be considered unsafe.**



Figure 1 - Extract from Baptcare Public Reports

Conclusion:

In accordance with the exhaustive list of non-compliant, inappropriate and inconsistent statements in the provided reports, supported by the list of general concerns and poor circulation of information relating to the project providing clear non-compliance to sections required to get to this stage of planning as follows:

- 52.20-1
- 52.20-3
- 52.20-4
- 52.20-6.4

We request cancellation of this proposal and that reconsideration of the future planning in the area is conducted in a manner which is commensurate to and supportive of the local community needs. All reconsideration must be achieved through community input and via the required council planning solutions established in the Brimbank area.

4. Having grown up in Keilor Downs (approx 27 years) im absolutely appalled & horrified that such dangerous & invasive development could be proposed let alone bypass basic planning protocols in comparison to other residential developments such as unit subdivisions. I also question how compliant the design is under siting regulations? This development is inappropriate for this area. The area has seen positive gentrification over the last few years with young families moving into the area. My brother who has always lived in the area also became part of this trend by

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|----|---|
| | <p>purchasing a house with his wife so he could live close by to our parents. Going into the future the long term older residents (including my parents) would benefit much more if this site was turned into nursing home or retirement village so older people can downsize and comfortably remain in an area which they are familiar and which is still safe due to the mass exodus of low socio economic demographic that infiltrated the area 10 or so years ago. Keilor Downs has returned to Grand & Family orientated area. It should be kept that way.</p> |
| 5. | <p>We are residence in the Keilor Downs area and wish to inform you that we respectfully oppose of the abovementioned Project as we will be heavily impacted by this dense Development.</p> <p>We wish to put across our concerns as initially we were under the impression that a Retirement Village was to be built on this site. Now it has become apparent that this is not the case. Our concerns are that the Development you want to build on this site will be severely congested and will create a high volume of traffic, not to mention there will be a parking issue as there is a only 1 garage per unit together with over population and waste management these are all major concerns for our community.</p> <p>Affordable housing projects should not be compounded to one area they should be integrated throughout the Community which we already have.</p> <p>We want this Proposal to be withdrawn and reconsidered to maybe extending the nursing home as Bapcare has stated that a nursing home is to be built in the near future adjacent to this Development they are proposing. We are in desperate need for a nursing home as we have a growing population of elderly are in grave need of good and state of the art facilities with great amenities. We will definately NOT OPPOSE to a nursing home as these developments are desperately needed.</p> |
| 6. | <p>Dear all,</p> <p>I raise to you today a significant and exhaustive set of major concerns that the Keilor Downs community (read - Over 1000 petition signatures, both physical and electronic, noted in Annex A of the attachment) are providing to you regarding the development at 21 Copernicus Way, Keilor Downs. It is our expectation that each of the 1000+ respondents are included as a formal delivery of opposition to this development.</p> <p>The issues contained in my attached assessment document are exhaustive, ranging from the significant lack of community consultation to unacceptable and worrying non-compliances with Clause 52.20 as well as inconsistencies and inaccuracies throughout the publicly available planning documentation. On this basis alone the development is requested to be halted.</p> <p>Above all of this, is the deeply concerning lack of consideration for the local community, including the vulnerable and elderly, who make up a large percentage of the Keilor Downs residents. These people have been ignored, and it could be suggested that they were avoided, from clear communication on the development intentions discussed. Further to this, the COVID-19 restrictions, imposed by this State Government, appear to have been absent from the considerations during this process and the inability for the community to be made aware of this development remain aberrantly evident.</p> |

Note that over 1000 responses have been received to object to this development which, due to COVID-19 restrictions, excludes many of the vulnerable and elderly as simple door knocking services are effectively unable to be conducted by this community to support their needs as this development and State Government appears to have forgotten that their opinion matters.

For these reasons, and the detailed information attached, I request your support to re-consider the development and its purpose in Keilor Downs. These decisions must be made with the appropriate level of Community engagement, rather than a ham-fisted approach to a solution which is inconsistent with the Keilor Downs regular and well established planning requirements which are able to be avoided due to the poorly written Clause 52.20.

7. a We (read: the respondents identified at Annex A of this document) are writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Baptistcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. We live in Keilor Downs, many with young families and many who have been residents of Brimbank for over 20 years. Of this community there are those in various areas of employment, including professionals in the Health and Community Services sector with extensive experience and support the awareness of the needs of communities that the project would target.

There are several key planning issues with the proposal we request consideration of and accordingly an appropriate response to. additionally supported by an exhaustive list on non-compliant and poorly considered planning solutions identified at Annex B of this document.

Lack of Community Consultation and Culturally inclusive practice.

We were informed about this proposal recently from our neighbours who live within 150 metres of the proposed construction, or via viewing of the obscurely located planning advice sign. Subsequently, a community consultation meeting about the proposal was conducted by Baptistcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project (estimated at no more than 15 residents), as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area which isn't often frequented by foot and is not accessible by car, and is additionally over 150m from the construction location. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents and is also non-compliant to Clause 52.20 of which this development's proposal is based upon.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English, and additionally, no alternative language service is available to understand the planning information. Some residents were able to attend the recent consultation meeting with Baptistcare via Zoom, however measures were

not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project whom are not familiar with technology services. It was evident from the meeting that this demographic was not present, and their voice continues to not have been heard.

In addition to this, there has been no consideration of the COVID-19 restrictions that are placed on the communities in Melbourne and the subsequent difficulty in access to information relating to this development; being that the only publicly available information is the obscurely positioned sign. This is further evidenced by the community itself forming this document, of it's own volition, with almost all residents being made aware via word of mouth.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptistcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above. To date, this information remains unavailable, unclear and unverified of fact.

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Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

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In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

We direct you to Annex A and Annex B of this document for the persons who oppose this development and further evidence of the non-compliance to Clause 52.20.

Annex A - Individuals who oppose this development

Please find at the following link over 1000 local residents who are opposed to this development. Each of these individuals is to be considered as a formal respondent to this objection and as such included in Baptcare's formal review paper than is supplied to the State Government or its Representatives in accordance with Clause 52.20 (Department of Health and Human Services or the Director of Housing)

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Annex B - Technical Assessment of Baptcare's Planning Reports

This assessment is generated from the following publically available reports:
<https://www.baptcare.org.au/services/housing/affordable-housing>

General Concerns:

1. This development is for 47 dwelling of unknown inhabitant numbers, however, it can be assumed that approximately 150 people will occupy this area. Given the significant numbers of inhabitants and dwellings being built, it is inappropriate that the distribution of advice relating to this build was only provided to a 150m radius of the build location. This is unlikely to have reached more than 15 dwellings. There will be significant impact to the surrounding area, including schools, public facilities (parks etc), community facilities (gyms/pools), retail and shopping facilities, of which the Keilor Downs community regularly utilise. The majority of the user community will remain unaware of this development. Furthermore it is with great disappointment that the COVID-19 restrictions were not taken into considerations, nor was the local council engaged for possible email sharing of this information. This has led to significantly inadequate sharing of the significance of 47 additional dwellings being built which would constitute the volume of dwellings along a 1km stretch of road in this area
 - a. This is inappropriate and requested to be addressed.
2. Given the type of dwellings and number, this will no doubt have a significant impact on the house values within a far greater radius than 150m. Initial assessments would indicate the impact to be to no less than 3km surrounding the development. This has not been addressed in the reports and consideration has not been provided to this effect.
 - a. This is inappropriate and must be addressed for the impacted community.
3. The general Social Housing policy of 'One in Nine' is a method of disbursing social housing tenants throughout the community. This is in recognition of best practice australia wide, being that people experiencing disadvantage are far more likely to move along the housing continuum and out of disadvantage when they are part of a socially diverse community: rather than collate the disadvantaged community together in a complex that, over time, will only erode and decay into another block of social housing 'flats' like those already existing around areas of Melbourne. Additionally, the City's own policy, requires any development not subject future occupants to undesirable levels of disturbance and/or nuisance.

4. In addition to para 3. This development will house disadvantaged individuals in a single location further putting pressure on community well being.
 - a. This is non-compliant with Clause 21.03-1.
5. Given the impact of social housing on local emergency services, and the significant number of new dwellings being built, there has been no review or consideration on the demand for local emergency services.
 - a. This is a significant oversight.
6. The location of the development is in a Commercial Zone 1.
 - a. This is non-compliant inconsistent with the normal General Residential or Residential Growth Zone requirements to produce high density dwellings (ref Clause 21.02)

Town Planning Report Concerns:

1. The development of 47 dwellings and estimated 150 inhabitants is likely to result in no less than approximately 60 cars (based on unit distributions). A single car park appears to be poorly assessed, despite it passing Clause 52.20 basic requirements.
2. The planning report notes that this project is developed adjacent to a proposed aged care facility (future). This appears to be inconsistent and provides no assessment of the future transport requirements for the land parcel.
3. Clause 15.01-2S: Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.
 - a. **Non-compliant.** Property values will be significantly impacted. The proposed dwellings are inconsistent with all properties in the local area (proposed are high density - existing are not high density). incomplete consideration of parking requirements (only 47 spaces provided, well below assessed inhabitant requirements).
4. Clause 15.01-5S: Pattern of local urban structure and subdivision. Heritage values and built form that reflect community identity.
 - a. **Non-compliant.** There has been no consideration of the local housing representation which have existed for over 50 years. The new development is inconsistent in size/look/feel of the entire suburb.
5. Clause 21.02-3: Apply the Commercial 1 Zone to facilitate retail uses and mixed use development consistent with the primary purpose of the zone.
 - a. **Non-compliant.** This development is only residential in purpose. There is zero foreseeable consideration for this clause in the development. It has not been addressed.
6. Clause 21.04: Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.
 - a. **Non-compliant.** The significance of moving from large parcel property of single dwellings immediately to high density dwellings is inconsistent.
7. Section 6.1: These statements are inconsistent with the requirements of Commercial Zone 1 and do not appear to be logical. Further detail and a re-write of the presented statements is essential.

- a. **Non-Compliant.** There is no logic to the proposed project achieving any of the requirements of this Commercial Zone 1 requirements.
- 8. Section 6.3: Incorrectly states that this site is not subject to the Special Building Overlay.
 - a. **Non-Compliant.** All Land data states clearly that this site is subject to DCPO - Development Contributions Plan Overlay - Schedule 2, DPO - Development Plan Overlay - Schedule 2, **SBO - Special Building Overlay**. Significant oversight on the planning report.
- 9. Section 6.5: Car parking assessment has been poorly conducted as previously stated throughout this correspondence.
- 10. Section 7.1: Brimbank Planning Policy Framework assessments: There is no assessment of the Keilor Downs Urban Design Framework document.
 - a. **This appears to be a significant oversight.**
- 11. Section 7.2: Land use. The statements here are inconsistent with the Commercial Zone 1 framework as previously explained in General Concerns 6. The large scale of proposed density may be appropriate for the proximity to the shopping area, but it is not consistent with a smooth transition between the low density dwellings immediately adjacent to the area.
 - a. **This appears to be a significant oversight.**
- 12. Section 7.8: As previously stated throughout this Correspondence, the stated allocation of parking is inconsistent and appears to be poorly calculated. This will undoubtedly result in additional parking outflows into the general residential area.
- 13. General: Of the Town Planning Report, there is a significant non-compliance that has been observed. From Clause 52.20-04: Consultation requirements Before the use or development commences: Public consultation, and consultation with the relevant municipal council, must be undertaken. A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to must be prepared to the satisfaction of the responsible authority
 - a. **Non-Compliant.** Public information sharing appears to have been poorly conducted, with sharing of relevant data and planning information to the community of Keilor Downs being assessed as significantly inappropriate. There has been little effort to share information with only a 150m radius of residential sites being advised of such a large build with implications to the wider community being ignored. The majority of the community has only been able to find the relevant information via the physical standing advice board at the site. Noting the impacts of COVID-19 and the relevant restrictions, this can only be reviewed as poorly considered and completely void of community impact assessment.

Transport Impact Assessment Concerns:

Parking assessments and driving assessments from the annexes of the document (by Onemilegrid). These parking diagrams show a barely achievable parking assessment, additionally is of note the 'impact' to the internal garage space with each vehicle diagram showing that the standard vehicle diagrams cannot fit within the garage. This is not consistent or appropriate with a reasonable assessment of parking conditions. Entry has not been considered. The presented turning radii do not appear to be achievable (specifically the 'red' vehicle in the diagram at Figure 1)

- a. **This is inappropriate and inconsiderate, additionally it can be considered unsafe.**

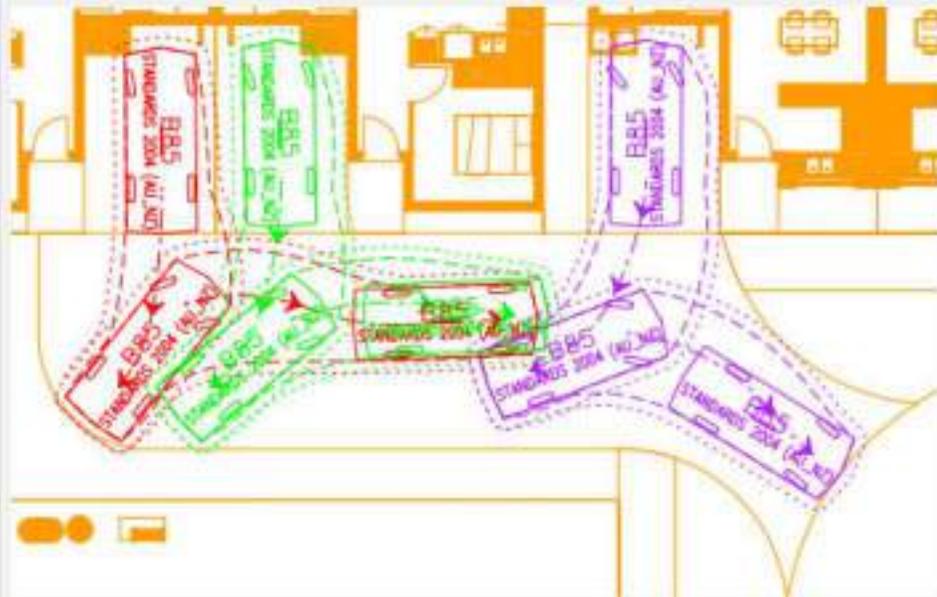


Figure 1 - Extract from Baptcare Public Reports

Conclusion:

In accordance with the exhaustive list of non-compliant, inappropriate and inconsistent statements in the provided reports, supported by the list of general concerns and poor circulation of information relating to the project providing clear non-compliance to sections required to get to this stage of planning as follows:

1. 52.20-1
2. 52.20-3
3. 52.20-4
4. 52.20-6.4

We request cancellation of this proposal and that reconsideration of the future planning in the area is conducted in a manner which is commensurate to and supportive of the local community needs. All reconsideration must be achieved through community input and via the required council planning solutions established in the Brimbank area.

7.b. I would like to know the following regarding the Victoria's Big Housing Build Program – No. 21A Copernicus Way, Keilor Downs.

1. Has this proposal been submitted to Brimbank Local Council? If not when will it be?

2. I noticed that the plans for the 47 new homes does not include open green space. Where do you expect the residents to spend outdoor recreational time.
3. This development does not provide any benefits to existing residents of the area, 4. Is this Stage 1 of a larger plan to develop and expand towards Copernicus Way?

Comment: There has been no community consultation regarding the use of this land and the impact it will have on the local residents.

Your response will be much appreciated.

8. I am a resident of Keilor Downs, and have lived here my entire life - close to four decades. I have seen the rise and fall and rise again of this suburb. In my humble opinion, Keilor Downs is at its peak. Finally, decent facilities are available and the shopping centre is becoming more gentrified. Most relevantly, the demography of the area is acutely improving, so much so, that I am now not afraid to walk the streets at night. I would not have said this a few years ago.

I am disgusted that as a resident who lives four streets from this proposed development, I was not consulted in any way. The first I heard about it was through a flyer in my letter box as a result of distressed neighbours trying to spread the word. This is my area, and I am proud to live here. However, I fear for the future of Keilor Downs, if this proposal is approved and built. Putting aside the disastrous social consequences that will flow, what a waste of an otherwise perfect block of land that could be used to improve the area even more. Why can't that area be used to house restaurants and cafes and a cinema, like "Station Street" at Watergardens? Or, why can't it be used to build a retirement village, to allow Keilor Downs' long term elderly residents to remain in the area they love, but with the support they require?

The prices in Keilor Downs are skyrocketing, and for good reason. People have realised how desirable a place it is to live. Please don't destroy the community I love, and for which I have helped mould.

There is absolutely no certainty what sorts of persons will be able to use this affordable housing. Will they be parolees? Will they be drug addicts? Why should we have to put up with this, when it was never put to a vote, or where the residents have not had adequate opportunity to voice their disapproval!?

There are so many empty apartment blocks in the CBD. If there is a need for affordable housing, why can't the Government rent out those apartments to residents in need (thereby also relieving the mortgage stress of the owners)? If there is nothing to fear by these residents, why hasn't that been considered an option? Or, is it easier to just dump them in a "safe Labor" seat in the northwest? The contempt shown for the salt of the earth, hard working, people of this suburb is nothing short of appalling.

I hope you don't just dismiss the significant outrage that this proposed development has caused. People are genuinely upset by this, and we beg you - please do not destroy our great suburb.

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| <p>9.</p> | <p>I was in attendance to the public presentation regarding this proposed estate and would like to lodge a written objection in regards to this proposal. A serious community action response will follow to oppose the inappropriate proposal on this site.</p> <ul style="list-style-type: none"> • We don't need or want public housing in an area that is booming with families paying top \$\$ just to buy in the area for all the amenities schools. and neighbourhood has to offer. • Public housing means more pressure on community facilities, childcare and schools medical facilities. There is clear evidence public housing estates are a threat to community safety via crime drugs social upheaval and community problems. Low income housing is people on welfare!. These characteristics all devalue property prices seriously. • This proposal is a disaster. We don't need public housing. Keilor Downs needs more parks, open spaces and food and entertainment local cafes and restaurants, perhaps a Piazza can be made on the site instead. A Piazza could be somewhere old people can meet play cards socialise; people can have day markets, you can add in mixed commercial residential housing to support business investment. • An alternative is to sub divide the land and allow premium quality private residential development. There is high demand for property in area and families and investors should be favoured as rate payers. This can be similar to what happened in Avondale Heights Milleara Rd. |
| <p>10. a</p> | <p>Hope this email finds you well.</p> <p>Just wanted to express my feedback regarding the proposed Social Housing project to be built next to Keilor Downs Shopping centre.</p> <p>I don't know how much weighting resident feedback has to this project at this stage or how far along the project is, but I don't support this development. My biggest concern is the added people and traffic congestion that will be caused from this development. The area around the shopping centre and the shopping centre itself is already quite congested; this development will only exasperate these issues. Ideally, this space is better served to expand the shopping centre to increase capacity or add additional commercial sites to improve local business presence in the area.</p> <p>Also, I am worried that these developments will attract more anti social behaviour in and around the shopping centre.</p> <p>I hope this feedback is noted and considered during this process.</p> <p>Thanks</p> |
| <p>10.b</p> | <p>Hope this email finds you well.</p> <p>Just wanted to express my feedback regarding the proposed Social Housing project to be built next to Keilor Downs Shopping centre.</p> |

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| | <p>I don't know how much weighting resident feedback has to this project at this stage or how far along the project is, but I don't support this development. My biggest concern is the added people and traffic congestion that will be caused from this development. The area around the shopping centre and the shopping centre itself is already quite congested; this development will only exasperate these issues. Ideally, this space is better served to expand the shopping centre to increase capacity or add additional commercial sites to improve local business presence in the area.</p> <p>Also, I am worried that these developments will attract more anti social behaviour in and around the shopping centre.</p> <p>I hope this feedback is noted and considered during this process.</p> |
| 11. | <p>Thank you for your response. I am very much against this proposal. While I appreciate what your organisation is trying to achieve, I really do feel that this is the wrong area for it. I am all for development but one such as this will bear unfavourably on Keilor Downs and it's surrounding suburbs.</p> <p>I have a been a resident in Keilor Downs for the last 10 years and have seen the area flourish beautifully. My kids go to school and kinder in Keilor Downs and my family and I feel very blessed to be able to live in such a lovely area.</p> <p>This plan to include 47 affordable housing units is actually quite shocking. As you're aware, our area has gone up considerably in terms of housing prices over the last few years. This will devalue our properties, bring more crime to the area and generally make Keilor Downs a second class suburb. Having these properties right near a shopping centre and child care centre is a recipe for disaster. I'm sure that if this plan is approved then there will be a mass exodus out of here.</p> <p>Given the ageing population in Keilor Downs, wouldn't it seem more feasible to use that empty land for a retirement village or something of a similar nature?</p> |
| 12. | <p>Good afternoon,</p> <p>We definitely say NO to Commision Housing developed by Babptcare at 50s Gillwell Road Lalor</p> <p>This will cause major traffic congestion and increasing low income demographic that will affect the area enormously.</p> <p>We need retirement homes, this is not the area for commission homes, there are lots of lands further out there they can develop for Commission Housing</p> |
| 13. | <p>Further to our ongoing discussions [REDACTED] with regard to the Keilor Central Shopping Centre. We have been forwarded your letter with regard to the Baptpcare Affordable Housing proposal at 21a Copernicus Way, Keilor Downs.</p> |

Our comments are provided below.

1. Background Context

██████████ are owners of the land at 80 Taylors Road, Keilor Downs. ██████████ is a leading specialist real estate investment and asset management company and the investment manager and property manager for ██████████. ██████████ land at 80 Taylors Road is occupied by the Keilor Central Shopping Centre.

Keilor Central is a convenience-based sub regional shopping centre that services a catchment area of 146,608 people. Keilor is defined as a “Neighbourhood Activity Centre” in Plan Melbourne, the State’s Metropolitan Planning Strategy in recognition of the cluster of retail and community uses which exist in the locality. The Shopping Centre is the largest landholding within the Activity Centre

Keilor Central adjoins the eastern boundary of the Baptcare site at 21a Copernicus Way. ██████████ land adjacent to No.21a is used for car parking associated with the shopping centre. A pedestrian connection is provided through the Baptcare site from Thornhill Drive.

Over a number of years, ██████████ has refined its masterplan for the Keilor Central Shopping Centre. The masterplan identifies the staged development of the centre over a 10-15 year timeframe. To provide the masterplan with statutory weight, the masterplan will take the form of an updated Development Plan and submitted to Council for approval. Discussions with Council have now progressed to a point where lodgement of an updated Development Plan is imminent. In this regard, Fort Street seeks to ensure that Baptcare’s plans for 21 Copernicus Way are responsive to both the existing and future context.

2. Submission

We have reviewed the proposal and provide the following comments:

Land Use

We are fully supportive of the proposed land use. The proposed land use will add to the diversity of housing within the Activity Centre and is complementary with existing and anticipated future land uses on the shopping centre site.

Maintaining pedestrian and cycling connection

We understand that Baptcare is seeking to maintain the pedestrian connection from Thornhill Drive to the centre. The current pedestrian connection is well utilised by users of the shopping centre. In this regard:

- a. We support the retention of the pedestrian connection to the site from Thornhill Drive.
- b. We support pedestrian connection being achieved in the current form proposed by Baptcare.
- c. The connection to 80 Taylors Road should consider both the current and future context of the Shopping Centre. The connection should provide a safe, logical, and direct location for pedestrians and cyclists to access the centre from Thornhill Drive.
- d. We request that should the current connection with the centre be moved, this should not result in unreasonable costs to Fort Street to relocate pedestrian infrastructure on its land.

Ensuring equitable development outcomes

The proposed development will introduce a sensitive interface within close proximity to the Shopping Centre land. In this regard, we request that the principles of “equitable development” be considered so as to not unreasonably impact the development potential of Shopping Centre. In this regard:

- a. A high level of development and change is anticipated on the Shopping Centre site in future. Development of the land at 21 Copernicus Way should not constrain the Shopping Centre. Consideration can be given to Fort Street’s masterplan which shows development of the car park adjacent to the common boundary with 21 Copernicus Way. In this circumstance, and in the context of a neighbourhood activity centre of this size, it would be realistic and reasonable to assume that commercial or residential buildings nearest the western edge of the shopping centre site could be developed in future.
- b. The proposed development should not be dependent on borrowing from the current “openness” of the shopping centre for its amenity. In this regard, we would suggest that consideration be given to the following:
 - i. Orientation of buildings
 - ii. Setback of buildings to the eastern boundary
 - iii. Appropriate fence heights
 - iv. Opportunities for mature perimiter landscaping to reduce the likelihood of overlooking private open space.
- c. Consideration should be given to the internal amenity of the proposed development will be impacted on by future development of the shopping centre. We seek to ensure that adequate daylight and outlook to windows, and the amenity of these rooms is not compromised when the shopping centre is developed in future.

3. Way forward

We recognise that there is a degree of uncertainty when planning for future change in this manner. We request that the principles of equitable development be considered to safeguard future development of the shopping centre and activity centre as a whole. This is important in achieving a mutually beneficial outcome on our respective sites, but also the broader strategic directions for the Activity Centre. We look forward to working with Baptcare towards an appropriate outcome.

4. Contact

For further enquiries, please feel free to contact me on the number below.

14. I am contacting you in relation to the recent news that Baptcare are planning a high density development behind Keilor Downs plaza in the vacant land across from the as-yet unfinished high density Aspect project.
I wish to register my concerns regarding this for the following reasons:
This is excessive, the Aspect high density project has not even yet been completed & this vacant land represents the only green space available to those residents- this would be better served being developed as outside space for those current & future residents.
In addition, where are all these people expected to park & access surrounding roads? The Keilor Downs plaza is already jam packed as it struggles to service the fast growing community- in the current Covid climate we have to consider people's use of public spaces and if there are hundreds of ppl living on top of each other with no open green space, having to do their shopping shoulder to shoulder we are going to struggle to keep future outbreaks under control.
This appears poorly considered & very rushed, only just becoming known recently with little opportunity for current residents to express their concerns. This is not an opposition to social housing, I am a Social Worker & more aware than most of the need & not blinded by the stereotype either, but rather a concern for current & future residents liveability- I sincerely hope there is to be more consultation with the community and transparency around how these decisions are being made.
Yours sincerely,
[name redacted]
15. Good afternoon,

I am writing to express my serious concerns over social housing development in keilor downs!

I have recently purchased a beautiful home for my family here and I cannot begin to express my dissatisfaction with the potential of social housing here!

There is nowhere near enough supply facilities for the current residents of keilor downs let alone adding many many more people and housing!!! We are limited to keilor downs plaza basically and have to leave the area for anything more!! The area is already a known outbreak zone for covid, why would we want to add more people to that!

Im sorry, but I have young children and I want them safe, adding low socioeconomics to the area increases the risk of gangs, violence, robberies and more!!! Sad, but true!!!!

The schooling system in the area is not equipped to take on more students!

| | |
|-------------------|---|
| | <p>The traffic in and out of Keilor Downs is already a nightmare! The one way out of Sunshine Avenue is a disaster, why add more problems and traffic to it!</p> <p>For the love of God, it's a solid NO and another NO from me!!!!!!</p> <p>Regards</p> |
| <p>16.</p> | <p>Dear all,</p> <p>I raise to you today a significant and exhaustive set of major concerns that the Keilor Downs community (read - Over 1000 petition signatures, both physical and electronic, noted in Annex A of the attachment) are providing to you regarding the development at 21 Copernicus Way, Keilor Downs. It is our expectation that each of the 1000+ respondents are included as a formal delivery of opposition to this development.</p> <p>The issues contained in my attached assessment document are exhaustive, ranging from the significant lack of community consultation to unacceptable and worrying non-compliances with Clause 52.20 as well as inconsistencies and inaccuracies throughout the publicly available planning documentation. On this basis alone the development is requested to be halted.</p> <p>Above all of this, is the deeply concerning lack of consideration for the local community, including the vulnerable and elderly, who make up a large percentage of the Keilor Downs residents. These people have been ignored, and it could be suggested that they were avoided, from clear communication on the development intentions discussed. Further to this, the COVID-19 restrictions, imposed by this State Government, appear to have been absent from the considerations during this process and the inability for the community to be made aware of this development remain aberrantly evident.</p> <p>Note that over 1000 responses have been received to object to this development which, due to COVID-19 restrictions, excludes many of the vulnerable and elderly as simple door knocking services are effectively unable to be conducted by this community to support their needs as this development and State Government appears to have forgotten that their opinion matters.</p> <p>For these reasons, and the detailed information attached, I request your support to re-consider the development and its purpose in Keilor Downs. These decisions must be made with the appropriate level of Community engagement, rather than a ham-fisted approach to a solution which is inconsistent with the Keilor Downs regular and well established planning requirements which are able to be avoided due to the poorly written Clause 52.20.</p> |
| <p>17.</p> | <p>We (read: the respondents identified at Annex A of this document) are writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Baptistcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. We live in Keilor Downs, many with young families and many who have been residents of Brimbank for over 20 years. Of this</p> |

community there are those in various areas of employment, including professionals in the Health and Community Services sector with extensive experience and support the awareness of the needs of communities that the project would target.

There are several key planning issues with the proposal we request consideration of and accordingly an appropriate response to. Additionally supported by an exhaustive list on non-compliant and poorly considered planning solutions identified at Annex B of this document.

Lack of Community Consultation and Culturally inclusive practice.

We were informed about this proposal recently from our neighbours who live within 150 metres of the proposed construction, or via viewing of the obscurely located planning advice sign. Subsequently, a community consultation meeting about the proposal was conducted by Baptcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project (estimated at no more than 15 residents), as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area which isn't often frequented by foot and is not accessible by car, and is additionally over 150m from the construction location. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents and is also non-compliant to Clause 52.20 of which this development's proposal is based upon.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English, and additionally, no alternative language service is available to understand the planning information. Some residents were able to attend the recent consultation meeting with Baptcare via Zoom, however measures were not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project whom are not familiar with technology services. It was evident from the meeting that this demographic was not present, and their voice continues to not have been heard.

In addition to this, there has been no consideration of the COVID-19 restrictions that are placed on the communities in Melbourne and the subsequent difficulty in access to information relating to this development; being that the only publicly available information is the obscurely positioned sign. This is further evidenced by the community itself forming this document, of its own volition, with almost all residents being made aware via word of mouth.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above. To date, this information remains unavailable, unclear and unverified of fact.

We understand that Baptcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Baptcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Baptcare have changed their plan of building a retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected. This is further supported by the significant lack of community consultation.

Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of

Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Baptcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

We direct you to Annex A and Annex B of this document for the persons who oppose this development and further evidence of the non-compliance to Clause 52.20.

Annex A - Individuals who oppose this development

Please find at the following link over 1000 local residents who are opposed to this development. Each of these individuals is to be considered as a formal respondent to this objection and as such included in Baptcare's formal review paper than is supplied to the State Government or its Representatives in accordance with Clause 52.20 (Department of Health and Human Services or the Director of Housing)

Current petition for rejection: https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilor-downs?fbclid=IwAR10U3M1B4S21a_Z15fZUc2lq1zQYOYb1U3GuFPfU0g0-Zw3V0P-Zmswiw

Annex B - Technical Assessment of Baptcare's Planning Reports

This assessment is generated from the following publically available reports:
<https://www.baptcare.org.au/services/housing/affordable-housing>

General Concerns:

7. This development is for 47 dwelling of unknown inhabitant numbers, however, it can be assumed that approximately 150 people will occupy this area. Given the significant numbers of inhabitants and dwellings being built, it is inappropriate that the distribution of advice relating to this build was only provided to a 150m radius of the build location. This is unlikely to have reached more than 15 dwellings. There will be significant impact to the surrounding area, including schools, public facilities (parks etc), community facilities (gyms/pools), retail and shopping facilities, of which the Keilor Downs community regularly utilise. The majority of the user community will remain unaware of this development. Furthermore it is with great disappointment that the COVID-19 restrictions were not taken into considerations, nor was the local council engaged for possible email sharing of this information. This has led to significantly inadequate sharing of the significance of 47 additional dwellings being built which would constitute the volume of dwellings along a 1km stretch of road in this area
 - a. This is inappropriate and requested to be addressed.
8. Given the type of dwellings and number, this will no doubt have a significant impact on the house values within a far greater radius than 150m. Initial assessments would indicate the impact to be to no less than 3km surrounding the development. This has not been addressed in the reports and consideration has not been provided to this effect.
 - a. This is inappropriate and must be addressed for the impacted community.
9. The general Social Housing policy of 'One in Nine' is a method of disbursing social housing tenants throughout the community. This is in recognition of best practice australia wide, being that people experiencing disadvantage are far more likely to move along the housing continuum and out of disadvantage when they are part of a socially diverse community: rather than collate the disadvantaged community together in a complex that, over time, will only erode and decay into another block of social housing 'flats' like those already existing around areas of Melbourne. Additionally, the City's own policy, requires any development not subject future occupants to undesirable levels of disturbance and/or nuisance.
10. In addition to para 3. This development will house disadvantaged individuals in a single location further putting pressure on community well being.
 - a. This is non-compliant with Clause 21.03-1.
11. Given the impact of social housing on local emergency services, and the significant number of new dwellings being built, there has been no review or consideration on the demand for local emergency services.
 - a. This is a significant oversight.
12. The location of the development is in a Commercial Zone 1.
 - a. This is non-compliant inconsistent with the normal General Residential or Residential Growth Zone requirements to produce high density dwellings (ref Clause 21.02)

Town Planning Report Concerns:

14. The development of 47 dwellings and estimated 150 inhabitants is likely to result in no less than approximately 60 cars (based on unit distributions). A single car park appears to be poorly assessed, despite it passing Clause 52.20 basic requirements.
15. The planning report notes that this project is developed adjacent to a proposed aged care facility (future). This appears to be inconsistent and provides no assessment of the future transport requirements for the land parcel.
16. Clause 15.01-2S: Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.
 - a. **Non-compliant.** Property values will be significantly impacted. The proposed dwellings are inconsistent with all properties in the local area (proposed are high density - existing are not high density). incomplete consideration of parking requirements (only 47 spaces provided, well below assessed inhabitant requirements).
17. Clause 15.01-5S: Pattern of local urban structure and subdivision. Heritage values and built form that reflect community identity.
 - a. **Non-compliant.** There has been no consideration of the local housing representation which have existed for over 50 years. The new development is inconsistent in size/look/feel of the entire suburb.
18. Clause 21.02-3: Apply the Commercial 1 Zone to facilitate retail uses and mixed use development consistent with the primary purpose of the zone.
 - a. **Non-compliant.** This development is only residential in purpose. There is zero foreseeable consideration for this clause in the development. It has not been addressed.
19. Clause 21.04: Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.
 - a. **Non-compliant.** The significance of moving from large parcel property of single dwellings immediately to high density dwellings is inconsistent.
20. Section 6.1: These statements are inconsistent with the requirements of Commercial Zone 1 and do not appear to be logical. Further detail and a re-write of the presented statements is essential.
 - a. **Non-Compliant.** There is no logic to the proposed project achieving any of the requirements of this Commercial Zone 1 requirements.
21. Section 6.3: Incorrectly states that this site is not subject to the Special Building Overlay.
 - a. **Non-Compliant.** All Land data states clearly that this site is subject to DCPO - Development Contributions Plan Overlay - Schedule 2, DPO - Development Plan Overlay - Schedule 2, **SBO - Special Building Overlay**. Significant oversight on the planning report.
22. Section 6.5: Car parking assessment has been poorly conducted as previously stated throughout this correspondence.
23. Section 7.1: Brimbank Planning Policy Framework assessments: There is no assessment of the Keilor Downs Urban Design Framework document.
 - a. **This appears to be a significant oversight.**

24. Section 7.2: Land use. The statements here are inconsistent with the Commercial Zone 1 framework as previously explained in General Concerns 6. The large scale of proposed density may be appropriate for the proximity to the shopping area, but it is not consistent with a smooth transition between the low density dwellings immediately adjacent to the area.
 - a. **This appears to be a significant oversight.**
25. Section 7.8: As previously stated throughout this Correspondence, the stated allocation of parking is inconsistent and appears to be poorly calculated. This will undoubtedly result in additional parking outflows into the general residential area.
26. General: Of the Town Planning Report, there is a significant non-compliance that has been observed. From Clause 52.20-04: Consultation requirements Before the use or development commences: Public consultation, and consultation with the relevant municipal council, must be undertaken. A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to must be prepared to the satisfaction of the responsible authority
 - a. **Non-Compliant.** Public information sharing appears to have been poorly conducted, with sharing of relevant data and planning information to the community of Keilor Downs being assessed as significantly inappropriate. There has been little effort to share information with only a 150m radius of residential sites being advised of such a large build with implications to the wider community being ignored. The majority of the community has only been able to find the relevant information via the physical standing advice board at the site. Noting the impacts of COVID-19 and the relevant restrictions, this can only be reviewed as poorly considered and completely void of community impact assessment.

Transport Impact Assessment Concerns:

Parking assessments and driving assessments from the annexes of the document (by Onemilegrid). These parking diagrams show a barely achievable parking assessment, additionally is of note the 'impact' to the internal garage space with each vehicle diagram showing that the standard vehicle diagrams cannot fit within the garage. This is not consistent or appropriate with a reasonable assessment of parking conditions. Entry has not been considered. The presented turning radii do not appear to be achievable (specifically the 'red' vehicle in the diagram at Figure 1)

- a. **This is inappropriate and inconsiderate, additionally it can be considered unsafe.**



Figure 1 - Extract from Baptcare Public Reports

Conclusion:

In accordance with the exhaustive list of non-compliant, inappropriate and inconsistent statements in the provided reports, supported by the list of general concerns and poor circulation of information relating to the project providing clear non-compliance to sections required to get to this stage of planning as follows:

1. 52.20-1
2. 52.20-3
3. 52.20-4
4. 52.20-6.4

We request cancellation of this proposal and that reconsideration of the future planning in the area is conducted in a manner which is commensurate to and supportive of the local community needs. All reconsideration must be achieved through community input and via the required council planning solutions established in the Brimbank area.

Regards,

[name redacted], Keilor Downs resident.

18. Thank you for your prompt response

I have two questions also if that's okay.

Am I able to share this with others or will they need to contact you directly?

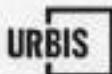
Also I have a concerns regarding the amount of units as this area is already very built up from the other units recently built in the same location

Thank you

19. a To whom it may concern,

Please see the attached documents

Thanks


CONSULTATION FEEDBACK FORM
BAPTCARE AFFORDABLE HOUSING PROPOSAL
NO. 21A COPERNICUS WAY, KEILOR DOWNS

Important Note: your submission will be included within a feedback report which is required by Council Voters to be made publicly available following a decision on the proposal.

Name:

Address:

Postal Address:

Email Address:

Telephone Number:

Please provide your feedback on the proposal:

I'm NOT HAPPY AT ALL WITH THE PROPOSAL
 KEILOR DOWNS HAS plenty housing commission
 houses ALREADY I STRONGLY REJECT THIS
 PLANS OUR HOUSES WILL DROP IN PRICES
 BIG TIMES AND NEIGHBOURHOOD WILL
 NOT BE SAFE ANY MORE.

How will you be affected by the proposal?

I will be highly affected AS I
 HAVE 8 GRANDCHILDREN; I HAVE
 NO FENCE AT THE FRONT AND I WILL
 BE SCARED TO BE SURROUNDED BY SO MANY
 MANY NEW COMERS. PLEASE DO NOT GO

Signature:

Date:

11-10-2021

AHEAD WITH THIS PROPOSAL

I object to the proposed affordable housing development in Keilor Downs.

The schools are at breaking point, filled to capacity with a high number of already vulnerable children. The gps are at breaking point looking after many people with a hugely diverse background from 40 different nationalities underrepresented. Sunshine hospital is also on the verge of collapse with people waiting in ambulances for over 8 hours. Lack of transport, the bus takes 40 minutes to get to the train station, no parking at the train station and lack of services. No mental health support, no youth support, no youth services. Lack of jobs in the area. Older hard working neighbourhood.

The suburb is already struggling at capacity and poverty is settling in with many people with mental health issues and no jobs, on the street and begging for money.

Please reconsider an alternate area.

Regards

[name redacted]

21. Hi Phil,

After living in Keilor downs for 20 years and walking / driving past this lot everyday it's good to see something done for the community with it.

You may get a lot of feedback where people are against this build but these are likely the people that have never needed affordable housing or have been in situations where they needed someplace affordable, cheap and safe to live.

I support this 100% of the way .

Kind regards

22. a **Re: Bapcare development of 21A Copernicus Way, Keilor Downs**

I am writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Bapcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. I live in Keilor Downs with my young family and have been a resident of Brimbank for over 20 years. I am currently employed as a professional in the Health and Community Services sector with over 25 years' experience and am aware of the needs of communities that the project would target.

There are several key planning issues with the proposal I would ask you consider and respond to accordingly.

Lack of Community Consultation and Culturally inclusive practice.

I was informed about this proposal recently from a neighbour whose parents live within 150 metres of the proposed construction. Subsequently, a community consultation meeting about the proposal was conducted by Baptcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project, as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area which isn't often frequented by foot and is not accessible by car. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English. Some residents were able to attend the recent consultation meeting with Baptcare via Zoom, however measures were not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project. It was evident from the meeting that this demographic was not present, and their voice not heard.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a

lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above.

We understand that Baptcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Baptcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Baptcare have changed their plan of building a retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected.

Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Baptcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health

and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

Thank you for considering this submission and I look forward to your response either via mobile on [phone number redacted] or email [email redacted].

Yours sincerely,
[name redacted]

22.b Re: Baptistcare development of 21A Copernicus Way, Keilor Downs

I am writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Baptistcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. I live in Keilor Downs with my young family and have been a resident of Brimbank for over 20 years. I am currently employed as a professional in the Health and Community Services sector with over 25 years' experience and am aware of the needs of communities that the project would target.

There are several key planning issues with the proposal I would ask you consider and respond to accordingly.

Lack of Community Consultation and Culturally inclusive practice.

I was informed about this proposal recently from a neighbour whose parents live within 150 metres of the proposed construction. Subsequently, a community consultation meeting about the proposal was conducted by Baptistcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project, as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area which isn't often frequented by foot and is not accessible by car. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English. Some residents were able to attend the recent consultation meeting with Baptistcare via Zoom, however measures were not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project. It was evident from the meeting that this demographic was not present, and their voice not heard.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above.

We understand that Baptcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Baptcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Baptcare have changed their plan of building a retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected.

Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of

Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Baptcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

Thank you for considering this submission and I look forward to your response either via mobile on [phone number redacted] or email [email redacted].

Yours sincerely,
[name redacted]

23. Hi Phil

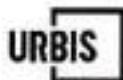
I have seen a lot of comments on FB around people in the local area opposing the plan for social housing. This is disappointing, as a resident of the area, I for one am in support of providing affordable housing close to amenities for people who are at risk of homelessness or struggling to get by. Housing prices have risen to a ridiculous extent and the opposition to this proposal does not seem to be based on anything substantive other than prejudice and fear (perhaps for their own property prices).

I find it offensive that there is an assumption these residents would contribute less or are less deserving than anyone else of having housing for their families.

My family are all for the proposal.

regards

24.



LEVEL 10
477 COLLINS STREET
MELBOURNE VIC 3008

039411 00441
URBIS Pty Ltd
ABN 13 626 290 226

**CONSULTATION FEEDBACK FORM
BAPTCARE AFFORDABLE HOUSING PROPOSAL
NO. 505 GILLWELL ROAD, LALOR**

Important Note: your submission will be included within a feedback report which is required by Planning Victoria to be made publicly available following a decision on the proposal.

| | |
|-------------------|------------|
| Name: | [REDACTED] |
| Address: | [REDACTED] |
| Postal Address: | [REDACTED] |
| Email Address: | [REDACTED] |
| Telephone Number: | [REDACTED] |

Please provide your feedback on the proposal:

Mosaic, Lalor is a new housing estate within an old suburb and the pre-existing infrastructure, schools and available services are currently stretched to capacity. The proposed 48 high density dwelling would add further strain and are not sustainable within the existing infrastructure and available services.

I understand and acknowledge the need for affordable housing but this need is addressed with the Riverlee development.

The Riverlee affordable housing development, surrounded by 2 main roads is within 1.5km from the proposed Baptcare Affordable Housing and will offer 500 townhouses and 1500 apartments.

Additional affordable housing (Baptcare Affordable Housing) is not required within 1.5km of Riverlee.

How will you be affected by the proposal:

- Local Roads will be congested with additional vehicles and access to Mosaic estate in Lalor in particular compromised.
- Access and availability to local public schools limited. Class sizes increased with potential for learning compromised.
- Less access to private and public services in the local area
- Additional Affordable Housing not required with Riverlee Affordable Housing opening under 1.5km away.

Signature:

Date:

25. My name is [redacted],

I along with my family are residents of Keilor Downs and have been living and raising our family here for just over 21 years. I made contact with the Brimbank council last week to enquire about the measurements markings of 21 copernicus way, only to be informed that they were not yet sure but we would be officially notified in writing once the plans were considered.

My husband and I were surprised to see the Notice of An Application for Planning consent with the information erected 16/10 which stipulates that a information forum being held on 12/10/21 before the sign was erected.

We oppose this proposal due to the already dense population of housing previously erected adjacent 7a copernicus way causing the traffic build up in particularly in the morning and afternoons, The child care centre is over populated schools are strictly zoned and the housing complex is not even half complete so additional multi complex housing will only cause more issues.

We will be joining whatever partitions necessary but just felt it necessary to voice our individual opinions of how we have already been impacted and how this proposal will make it worse for us individually and all existing local residents.

The vacant land would be better suited for better local facilities extend the shopping centre and parking.

Forwarded for your information and response.

Regards

26. We (read: the respondents identified at Annex A of this document) are writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Bapcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. We live in Keilor Downs, many with young families and many who have been residents of Brimbank for over 20 years. Of this community there are those in various areas of employment, including professionals in the Health and Community Services sector with extensive experience and support the awareness of the needs of communities that the project would target.

There are several key planning issues with the proposal we request consideration of and accordingly an appropriate response to. additionally supported by an exhaustive list on non-compliant and poorly considered planning solutions identified at Annex B of this document.

Lack of Community Consultation and Culturally inclusive practice.

We were informed about this proposal recently from our neighbours who live within 150 metres of the proposed construction, or via viewing of the obscurely located planning advice sign. Subsequently, a community consultation meeting about the proposal was conducted by Baptcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project (estimated at no more than 15 residents), as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area which isn't often frequented by foot and is not accessible by car, and is additionally over 150m from the construction location. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents and is also non-compliant to Clause 52.20 of which this development's proposal is based upon.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English, and additionally, no alternative language service is available to understand the planning information. Some residents were able to attend the recent consultation meeting with Baptcare via Zoom, however measures were not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project whom are not familiar with technology services. It was evident from the meeting that this demographic was not present, and their voice continues to not have been heard.

In addition to this, there has been no consideration of the COVID-19 restrictions that are placed on the communities in Melbourne and the subsequent difficulty in access to information relating to this development; being that the only publicly available information is the obscurely positioned sign. This is further evidenced by the community itself forming this document, of it's own volition, with almost all residents being made aware via word of mouth.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often

based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Bapcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above. To date, this information remains unavailable, unclear and unverified of fact.

We understand that Bapcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Bapcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Bapcare have changed their plan of building a retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected. This is further supported by the significant lack of community consultation.

Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires

additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Baptcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

We direct you to Annex A and Annex B of this document for the persons who oppose this development and further evidence of the non-compliance to Clause 52.20.

Annex A - Individuals who oppose this development

Please find at the following link over 1000 local residents who are opposed to this development. Each of these individuals is to be considered as a formal respondent to this objection and as such included in Baptcare's formal review paper than is supplied to the State Government or its Representatives in accordance with Clause 52.20 (Department of Health and Human Services or the Director of Housing)

Current petition for rejection: https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilor-downs?fbclid=IwAR10U3M1B4S21a_Z1SfZUc2lq1zQYOYb1U3GuFPfU0g0-Zw3V0P-Zmswiw

Annex B - Technical Assessment of Baptcare's Planning Reports

This assessment is generated from the following publically available reports:
<https://www.baptcare.org.au/services/housing/affordable-housing>

General Concerns:

13. This development is for 47 dwelling of unknown inhabitant numbers, however, it can be assumed that approximately 150 people will occupy this area. Given the significant numbers of inhabitants and dwellings being built, it is inappropriate that the distribution of advice relating to this build was only provided to a 150m radius of the build location. This is unlikely to have reached more than 15 dwellings. There will be significant impact to the surrounding area, including schools, public facilities (parks etc), community facilities (gyms/pools), retail and shopping facilities, of which the Keilor Downs community regularly utilise. The majority of the user

community will remain unaware of this development. Furthermore it is with great disappointment that the COVID-19 restrictions were not taken into considerations, nor was the local council engaged for possible email sharing of this information. This has led to significantly inadequate sharing of the significance of 47 additional dwellings being built which would constitute the volume of dwellings along a 1km stretch of road in this area

- a. **This is inappropriate and requested to be addressed.**
14. Given the type of dwellings and number, this will no doubt have a significant impact on the house values within a far greater radius than 150m. Initial assessments would indicate the impact to be to no less than 3km surrounding the development. This has not been addressed in the reports and consideration has not been provided to this effect.
 - a. **This is inappropriate and must be addressed for the impacted community.**
15. The general Social Housing policy of 'One in Nine' is a method of disbursing social housing tenants throughout the community. This is in recognition of best practice australia wide, being that people experiencing disadvantage are far more likely to move along the housing continuum and out of disadvantage when they are part of a socially diverse community: rather than collate the disadvantaged community together in a complex that, over time, will only erode and decay into another block of social housing 'flats' like those already existing around areas of Melbourne. Additionally, the City's own policy, requires any development not subject future occupants to undesirable levels of disturbance and/or nuisance.
16. In addition to para 3. This development will house disadvantaged individuals in a single location further putting pressure on community well being.
 - a. **This is non-compliant** with Clause 21.03-1.
17. Given the impact of social housing on local emergency services, and the significant number of new dwellings being built, there has been no review or consideration on the demand for local emergency services.
 - a. This is a significant oversight.
18. The location of the development is in a Commercial Zone 1.
 - a. **This is non-compliant** inconsistent with the normal General Residential or Residential Growth Zone requirements to produce high density dwellings (ref Clause 21.02)

Town Planning Report Concerns:

27. The development of 47 dwellings and estimated 150 inhabitants is likely to result in no less than approximately 60 cars (based on unit distributions). A single car park appears to be poorly assessed, despite it passing Clause 52.20 basic requirements.
28. The planning report notes that this project is developed adjacent to a proposed aged care facility (future). This appears to be inconsistent and provides no assessment of the future transport requirements for the land parcel.
29. Clause 15.01-2S: Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.
 - a. **Non-compliant.** Property values will be significantly impacted. The proposed dwellings are inconsistent with all properties in the local area (proposed are high density - existing are not high density). incomplete consideration of parking requirements (only 47 spaces provided, well below assessed inhabitant requirements).

30. Clause 15.01-5S: Pattern of local urban structure and subdivision. Heritage values and built form that reflect community identity.
a. **Non-compliant.** There has been no consideration of the local housing representation which have existed for over 50 years. The new development is inconsistent in size/look/feel of the entire suburb.
31. Clause 21.02-3: Apply the Commercial 1 Zone to facilitate retail uses and mixed use development consistent with the primary purpose of the zone.
a. **Non-compliant.** This development is only residential in purpose. There is zero foreseeable consideration for this clause in the development. It has not been addressed.
32. Clause 21.04: Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.
a. **Non-compliant.** The significance of moving from large parcel property of single dwellings immediately to high density dwellings is inconsistent.
33. Section 6.1: These statements are inconsistent with the requirements of Commercial Zone 1 and do not appear to be logical. Further detail and a re-write of the presented statements is essential.
a. **Non-Compliant.** There is no logic to the proposed project achieving any of the requirements of this Commercial Zone 1 requirements.
34. Section 6.3: Incorrectly states that this site is not subject to the Special Building Overlay.
a. **Non-Compliant.** All Land data states clearly that this site is subject to DCPO - Development Contributions Plan Overlay - Schedule 2, DPO - Development Plan Overlay - Schedule 2, **SBO - Special Building Overlay**. Significant oversight on the planning report.
35. Section 6.5: Car parking assessment has been poorly conducted as previously stated throughout this correspondence.
36. Section 7.1: Brimbank Planning Policy Framework assessments: There is no assessment of the Keilor Downs Urban Design Framework document.
a. **This appears to be a significant oversight.**
37. Section 7.2: Land use. The statements here are inconsistent with the Commercial Zone 1 framework as previously explained in General Concerns 6. The large scale of proposed density may be appropriate for the proximity to the shopping area, but it is not consistent with a smooth transition between the low density dwellings immediately adjacent to the area.
a. **This appears to be a significant oversight.**
38. Section 7.8: As previously stated throughout this Correspondence, the stated allocation of parking is inconsistent and appears to be poorly calculated. This will undoubtedly result in additional parking outflows into the general residential area.
39. General: Of the Town Planning Report, there is a significant non-compliance that has been observed. From Clause 52.20-04: Consultation requirements Before the use or development commences: Public consultation, and consultation with the relevant municipal council, must be undertaken. A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to must be prepared to the satisfaction of the responsible authority

- a. **Non-Compliant.** Public information sharing appears to have been poorly conducted, with sharing of relevant data and planning information to the community of keilor downs being assessed as significantly inappropriate. There has been little effort to share information with only a 150m radius of residential sites being advised of such a large build with implications to the wider community being ignored. The majority of the community has only been able to find the relevant information via the physical standing advice board at the site. Noting the impacts of COVID-19 and the relevant restrictions, this can only be reviewed as poorly considered and completely void of community impact assessment.

Transport Impact Assessment Concerns:

Parking assessments and driving assessments from the annexes of the document (by Onemilegrid). These parking diagrams show a barely achievable parking assessment, additionally is of note the 'impact' to the internal garage space with each vehicle diagram showing that the standard vehicle diagrams cannot fit within the garage. This is not consistent or appropriate with a reasonable assessment of parking conditions. Entry has not been considered. The presented turning radii do not appear to be achievable (specifically the 'red' vehicle in the diagram at Figure 1)

- a. **This is inappropriate and inconsiderate, additionally it can be considered unsafe.**



Figure 1 - Extract from Baptcare Public Reports

Conclusion:

In accordance with the exhaustive list of non-compliant, inappropriate and inconsistent statements in the provided reports, supported by the list of general concerns and poor circulation of information relating to the project providing clear non-compliance to sections required to get to this stage of planning as follows:

1. 52.20-1
2. 52.20-3
3. 52.20-4
4. 52.20-6.4

We request cancellation of this proposal and that reconsideration of the future planning in the area is conducted in a manner which is commensurate to and supportive of the local community needs. All reconsideration must be achieved through community input and via the required council planning solutions established in the Brimbank area.

27. Dear Phil

I'm writing this email in regards to the public housing in Keilor Downs.

Is this proposal going ahead as I'm concerned being a resident of Keilor Downs it will bring undesirable people in the area and effect the safety of the area as the type of individuals living in these houses are not the types of people we want in our community.

Are you able to outline why these houses are being built in Keilor Downs what types of individuals will be living in these houses?

Regards

28. Dear Phil,

My name is [redacted] of [street number redacted] Thornhill Drive, Keilor Down, I am writing to you about Baptcare's High Density Housing Project in Keilor Downs. I would like to provide feedback and strongly object to this plan for several reasons:

1. Traffic Generation – with new housing in progress – how can we complete any studies or have real data on how this will impact our community
2. Where will people park? With 47 units and 150+ residents estimated for this small land, parking will present a challenge
3. Baptcare have hidden the Permit Signage – a shady tactic so residents cannot object
4. Infrastructure uplift – whom will be responsible and accountable?
5. Resource uplift – Police resourcing has never been a priority by the local or state government, for 3038 – even with continued residential growth. West has 1 Police Office for every 1600 residence compared to Eastern Councils who have 1 Police Officer for every 800 residences. THAT IS A 50% GAP IN SUPPORT
6. Mental Health Support for our existing residence is below average, especially during these unprecedented times. We are witnessing a high rate of mental health issues in our community and these are not being addressed nor supported by our Local and State Government. An increase in vulnerable residence is only going to place more pressure on the Mental Health System.

We request transparency around accountability and responsibility to address these concerns and a formalized plan, prior to high-density planning is considered.

7. Baptcare stated a survey or studies have concluded this is a requirement in our neighborhood – we request to review these surveys and the foundations in which have concluded this statement?
8. A change to the atmosphere of area (for the worse) and impact on the character of the neighborhood is in question
9. The area is subject to overdevelopment
10. SAFETY – for our community is a concern, being so close to the plaza, late-night shopping and other concerns with vulnerable individuals could pose issues
11. For most residences, English is their Second Language – this means poor communication and notice has hindered our opportunity to review proposals
12. Our LOCAL COUNCIL have been silent on the matter
13. Was proposed to be an aged-cared facility when sold in 2016, but the 150 million Housing Grant announced by the State Government has obviously changed their proposal to Social Housing
14. We currently have Constraints with Childcare and Kindergarden facilities, and this will load the burden.
15. We have a shortage of Carers in our area, this will just create an overload
16. Existing issues should be resolved before they create more chaos

I do not support this project. This should be reviewed and re-considered for the benefit of the existing community.

Yours sincerely

29. [names redacted]

Address: [street number redacted] kavanagh cres, keilor downs 3038

Postal address: as above

Email: [redacted]

Phone: [redacted]

Feedback:

We are opposed to the baptcare housing project.

How would we be affected:

We have recently bought and moved to keilor downs. If we knew this housing project was going to occur before we bought we would not have bought our house and moved into the area.

We think this will reduce the value of our house and increase chances of theft, disturbances, assaults and massively increase congestion. We would also feel less safe in the keilor central shopping centre.

We feel we would also need to invest further into security measures around our house.

There is also concern of the safety of children considering the proximity to a childcare centre.

We are not alone in our thoughts and concerns as per the change.org petition objecting this proposal which has more than 1000 signatures at time of writing.

<https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilor-downs>

Regards

[names redacted]

30. Hi Gleason/Helen,

We are the resident/owner at Keilor Downs. We concerned and strongly against the project next to Thornhill Drive. We hope you will reconsider and relocate the project elsewhere. Your consideration will be much appreciated.

Thank you.

Regards,

Keilor Downs resident

[names redacted]

31. Hello Paul

I am contacting you on behalf of a number of residents concerned with this proposal.

I wish to be involved in the online discussion but in advance would like to see the kind of tenants Bapcare intends to house there. This information is absent from documentation.

This area has had its share of problems with housing commission / related tenants where the underlying control mechanisms have failed, leading to frustration and anger amongst a number of residents who now wish to know more about what the composition is intended to look like.

Any other concerns will be raised once we have communicated with Brimbank Council whom I understand have an adjoining property to the proposed site.

I look forward to your response.

[name redacted]

Hi Phil

Thank you for your email.

Ideally we would like further information.

Just so we are clear, this is not about segregation, bias or racism. Its is simply that we have had an overrepresentation of certain groups who have caused issues both locally and in surrounding suburbs including St Albans, Kealba etc: These issues have lingered for quite some time and neither state government, department of housing or police have had any significant impact. In most cases these matters drag on at VCAT for years.

May we please see the process Baptcare intends to use for the selection process and more specifically, what if any conditions will be placed on potential applications to determine best outcomes for the impacted homes and immediate area.

32.

Dear all,

I raise to you today a significant and exhaustive set of major concerns that the Keilor Downs community (read - Over 1000 petition signatures, both physical and electronic, noted in Annex A of the attachment) are providing to you regarding the development at 21 Copernicus Way, Keilor Downs. It is our expectation that each of the 1000+ respondents are included as a formal delivery of opposition to this development.

The issues contained in my attached assessment document are exhaustive, ranging from the significant lack of community consultation to unacceptable and worrying non-compliances with Clause 52.20 as well as inconsistencies and inaccuracies throughout the publicly available planning documentation. On this basis alone the development is requested to be halted.

Above all of this, is the deeply concerning lack of consideration for the local community, including the vulnerable and elderly, who make up a large percentage of the Keilor Downs residents. These people have been ignored, and it could be suggested that they were avoided, from clear communication on the development intentions discussed. Further to this, the COVID-19 restrictions, imposed by this State Government, appear to have been absent from the considerations during this process and the inability for the community to be made aware of this development remain aberrantly evident.

Note that over 1000 responses have been received to object to this development which, due to COVID-19 restrictions, excludes many of the vulnerable and elderly as simple door knocking services are effectively unable to be conducted by this community to support their needs as this development and State Government appears to have forgotten that their opinion matters.

For these reasons, and the detailed information attached, I request your support to re-consider the development and its purpose in Keilor Downs. These decisions must be made with the appropriate level of Community engagement, rather than a ham-fisted approach to a solution which is inconsistent with the Keilor Downs regular and well established planning requirements which are able to be avoided due to the poorly written Clause 52.20.

Dear all,

I raise an addendum to the below correspondence (Mon, Oct 18, 2021 at 10:56 PM). This is related to the homelessness statistics of the proposed area (Keilor Downs) and the surrounding suburbs. This information impacts both the previous correspondence from myself, and additionally relates to the Brimbank Council meeting of the 19th October 2021.

The addendum is as follows:

Further concern with the proposed project is the basis of the homelessness data in which the location is recommended. We have found the data at the government's ABS repository (Ref 2.) shows that Keilor downs, and most of the surrounding suburbs, are resident to very low numbers of homelessness (under 32 records, this is inline with most surrounding suburbs such as Taylors Lakes, Taylors Hill, Keilor, Keilor East etc). This is not consistent with placing 'at risk' residents in a location which is suitable for enabling them to progress with their lives. It is contrary to the intent of social housing as this will place residents far from their current likely residence (such as Sunshine, Sunshine West with over 200 records of homelessness) and away from their known community and essential services. This appears to be inconsistent with the approach detailed within the planning documentation and the overall intent of new Social Housing.

The information found is contrary to the local Council of Brimbank Meeting (19 October 2021) in which the Council stated, on multiple occasions, that "this area is subject to some of the highest rates of homelessness in victoria". Not only does this show a poorly prepared Council, but an uneducated Council which is out of touch with its community. Further to my concern is the significant lack of review and knowledge of our local council members, specifically Mayor Rasic lack of leadership and Deputy Mayor Nguyen's incorrect statements. The Deputy Mayor and multiple Councillors showed a significant lack of understanding of the proposed build where questions were posed to the forum which included but was not limited to:

- Whether the proposal was for 'Social housing' or 'Affordable Housing';
- How many dwellings were proposed;
- The proposed number of levels which were to be built;
- The location of the build;
- The proposed changes to the surrounding land which retains approvals for further developments; and
- Which housing company was providing the planning documentation and executing the project.

Due to the above reasons, I have significant doubt that the minutes released at Ref 1. were completed with accuracy and due process given the unconscionable lack of understanding presented by this local Council.

Regards,
[name redacted]

References:

1. Brimbank Council Meeting Minutes (19 October 2021)

<https://www.brimbank.vic.gov.au/council/council-meetings/2021-council-meeting-agendas-and-minutes>

<https://www.youtube.com/playlist?list=PLEw1sHlvzDqGbWOKNATAvxzD29bhvDIB> (note: Recording is yet to be uploaded)

2. ABS Census of population and housing estimating homelessness

<https://www.abs.gov.au/statistics/people/housing/census-population-and-housing-estimating-homelessness/2016>

33. Hello
Has this been approved yet? I hope not, as this is will be catastrophic for the area. Can you please outline what the process of this development is?
Thank you

Thank you for your response. I am very much against this proposal. While I appreciate what your organisation is trying to achieve, I really do feel that this is the wrong area for it. I am all for development but one such as this will bear unfavourably on Keilor Downs and it's surrounding suburbs.

I have a been a resident in Keilor Downs for the last 10 years and have seen the area flourish beautifully. My kids go to school and kinder in Keilor Downs and my family and I feel very blessed to be able to live in such a lovely area.

This plan to include 47 affordable housing units is actually quite shocking. As you're aware, our area has gone up considerably in terms of housing prices over the last few years. This will devalue our properties, bring more crime to the area and generally make Keilor Downs a second class suburb. Having these

properties right near a shopping centre and child care centre is a recipe for disaster. I'm sure that if this plan is approved then there will be a mass exodus out of here.

Given the ageing population in Keilor Downs, wouldn't it seem more feasible to use that empty land for a retirement village or something of a similar nature?

34. We (read: the respondents identified at Annex A of this document) are writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Baptistcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. We live in Keilor Downs, many with young families and many who have been residents of Brimbank for over 20 years. Of this community there are those in various areas of employment, including professionals in the Health and Community Services sector with extensive experience and support the awareness of the needs of communities that the project would target.

There are several key planning issues with the proposal we request consideration of and accordingly an appropriate response to, additionally supported by an exhaustive list on non-compliant and poorly considered planning solutions identified at Annex B of this document.

Lack of Community Consultation and Culturally inclusive practice.

We were informed about this proposal recently from our neighbours who live within 150 metres of the proposed construction, or via viewing of the obscurely located planning advice sign. Subsequently, a community consultation meeting about the proposal was conducted by Baptistcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project (estimated at no more than 15 residents), as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area which isn't often frequented by foot and is not accessible by car, and is additionally over 150m from the construction location. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents and is also non-compliant to Clause 52.20 of which this development's proposal is based upon.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English, and additionally, no alternative language service is available to understand the planning information. Some residents were able to attend the recent consultation meeting with Baptistcare via Zoom, however measures were not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project whom are not familiar with technology services. It was evident from the meeting that this demographic was not present, and their voice continues to not have been heard.

In addition to this, there has been no consideration of the COVID-19 restrictions that are placed on the communities in Melbourne and the subsequent difficulty in access to information relating to this development; being that the only publicly available information is the obscurely positioned sign. This is further evidenced by the community itself forming this document, of it's own volition, with almost all residents being made aware via word of mouth.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly

into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above. To date, this information remains unavailable, unclear and unverified of fact.

We understand that Baptcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Baptcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Baptcare have changed their plan of building a retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected. This is further supported by the significant lack of community consultation.

Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Baptcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of

vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

We direct you to Annex A and Annex B of this document for the persons who oppose this development and further evidence of the non-compliance to Clause 52.20.

Annex A - Individuals who oppose this development

Please find at the following link over 1000 local residents who are opposed to this development. Each of these individuals is to be considered as a formal respondent to this objection and as such included in Baptcare's formal review paper than is supplied to the State Government or its Representatives in accordance with Clause 52.20 (Department of Health and Human Services or the Director of Housing)

Current petition for rejection: https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilor-downs?fbclid=IwAR10U3M1B4S21a_Z1SfZUc2lq1zQYOYb1U3GuFPifU0g0-Zw3V0P-Zmswiw

Annex B - Technical Assessment of Baptcare's Planning Reports

This assessment is generated from the following publically available reports:
<https://www.baptcare.org.au/services/housing/affordable-housing>

General Concerns:

1. This development is for 47 dwelling of unknown inhabitant numbers, however, it can be assumed that approximately 150 people will occupy this area. Given the significant numbers of inhabitants and dwellings being built, it is inappropriate that the distribution of advice relating to this build was only provided to a 150m radius of the build location. This is unlikely to have reached more than 15 dwellings. There will be significant impact to the surrounding area, including schools, public facilities (parks etc), community facilities (gyms/pools), retail and shopping facilities, of which the Keilor Downs community regularly utilise. The majority of the user community will remain unaware of this development. Furthermore it is with great disappointment that the COVID-19 restrictions were not taken into considerations, nor was the local council engaged for possible email sharing of this information. This has led to significantly inadequate sharing of the significance of 47 additional dwellings being built which would constitute the volume of dwellings along a 1km stretch of road in this area
 - a. This is inappropriate and requested to be addressed.
2. Given the type of dwellings and number, this will no doubt have a significant impact on the house values within a far greater radius than 150m. Initial assessments would indicate the impact to be to no less than 3km surrounding the development. This has not been addressed in the reports and consideration has not been provided to this effect.
 - a. This is inappropriate and must be addressed for the impacted community.
3. The general Social Housing policy of 'One in Nine' is a method of disbursing social housing tenants throughout the community. This is in recognition of best practice australia wide, being that people experiencing disadvantage are far more likely to move along the housing continuum and out of disadvantage when they are part of a socially diverse community: rather than collate the disadvantaged community together in a complex that, over time, will only erode and decay into another block of social housing 'flats' like those already existing around areas of Melbourne. Additionally, the City's own policy, requires any development not subject future occupants to undesirable levels of disturbance and/or nuisance.
4. In addition to para 3. This development will house disadvantaged individuals in a single location further putting pressure on community well being.
 - a. This is non-compliant with Clause 21.03-1.
5. Given the impact of social housing on local emergency services, and the significant number of new dwellings being built, there has been no review or consideration on the demand for local emergency services.

a. This is a significant oversight.

6. The location of the development is in a Commercial Zone 1.

a. This is non-compliant inconsistent with the normal General Residential or Residential Growth Zone requirements to produce high density dwellings (ref Clause 21.02)

Town Planning Report Concerns:

1. The development of 47 dwellings and estimated 150 inhabitants is likely to result in no less than approximately 60 cars (based on unit distributions). A single car park appears to be poorly assessed, despite it passing Clause 52.20 basic requirements.

2. The planning report notes that this project is developed adjacent to a proposed aged care facility (future). This appears to be inconsistent and provides no assessment of the future transport requirements for the land parcel.

3. Clause 15.01-2S: Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.

a. Non-compliant. Property values will be significantly impacted. The proposed dwellings are inconsistent with all properties in the local area (proposed are high density - existing are not high density). Incomplete consideration of parking requirements (only 47 spaces provided, well below assessed inhabitant requirements).

4. Clause 15.01-5S: Pattern of local urban structure and subdivision. Heritage values and built form that reflect community identity.

a. Non-compliant. There has been no consideration of the local housing representation which have existed for over 50 years. The new development is inconsistent in size/look/feel of the entire suburb.

5. Clause 21.02-3: Apply the Commercial 1 Zone to facilitate retail uses and mixed use development consistent with the primary purpose of the zone.

a. Non-compliant. This development is only residential in purpose. There is zero foreseeable consideration for this clause in the development. It has not been addressed.

6. Clause 21.04: Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.

a. Non-compliant. The significance of moving from large parcel property of single dwellings immediately to high density dwellings is inconsistent.

7. Section 6.1: These statements are inconsistent with the requirements of Commercial Zone 1 and do not appear to be logical. Further detail and a re-write of the presented statements is essential.

a. Non-Compliant. There is no logic to the proposed project achieving any of the requirements of this Commercial Zone 1 requirements.

8. Section 6.3: Incorrectly states that this site is not subject to the Special Building Overlay.

a. Non-Compliant. All Land data states clearly that this site is subject to DCPO - Development Contributions Plan Overlay - Schedule 2, DPO - Development Plan Overlay - Schedule 2, SBO - Special Building Overlay. Significant oversight on the planning report.

9. Section 6.5: Car parking assessment has been poorly conducted as previously stated throughout this correspondence.

10. Section 7.1: Brimbank Planning Policy Framework assessments: There is no assessment of the Keilor Downs Urban Design Framework document.

a. This appears to be a significant oversight.

11. Section 7.2: Land use. The statements here are inconsistent with the Commercial Zone 1 framework as previously explained in General Concerns 6. The large scale of proposed density may be appropriate for the proximity to the shopping area, but it is not consistent with a smooth transition between the low density dwellings immediately adjacent to the area.

a. This appears to be a significant oversight.

12. Section 7.8: As previously stated throughout this Correspondence, the stated allocation of parking is inconsistent and appears to be poorly calculated. This will undoubtedly result in additional parking outflows into the general residential area.

13. General: Of the Town Planning Report, there is a significant non-compliance that has been observed. From Clause 52.20-04: Consultation requirements Before the use or development commences: Public consultation, and consultation with the relevant municipal council, must be undertaken. A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to must be prepared to the satisfaction of the responsible authority

a. Non-Compliant. Public information sharing appears to have been poorly conducted, with sharing of relevant data and planning information to the community of Keilor Downs being assessed as significantly inappropriate. There has been little effort to share information with only a 150m radius of residential sites being advised of such a large build with implications to the wider community being ignored. The majority of the community has only been able to find the relevant

information via the physical standing advice board at the site. Noting the impacts of COVID-19 and the relevant restrictions, this can only be reviewed as poorly considered and completely void of community impact assessment.

Transport Impact Assessment Concerns:

Parking assessments and driving assessments from the annexes of the document (by Onemilegrid). These parking diagrams show a barely achievable parking assessment, additionally is of note the 'impact' to the internal garage space with each vehicle diagram showing that the standard vehicle diagrams cannot fit within the garage. This is not consistent or appropriate with a reasonable assessment of parking conditions. Entry has not been considered. The presented turning radii do not appear to be achievable (specifically the 'red' vehicle in the diagram at Figure 1)

- a. This is inappropriate and inconsiderate, additionally it can be considered unsafe.



Figure 1 - Extract from Baptcare Public Reports

Figure 1 - Extract from Baptcare Public Reports

Conclusion:

In accordance with the exhaustive list of non-compliant, inappropriate and inconsistent statements in the provided reports, supported by the list of general concerns and poor circulation of information relating to the project providing clear non-compliance to sections required to get to this stage of planning as follows:

1. 52.20-1
2. 52.20-3
3. 52.20-4
4. 52.20-6.4

| | |
|-----|--|
| | <p>We request cancellation of this proposal and that reconsideration of the future planning in the area is conducted in a manner which is commensurate to and supportive of the local community needs. All reconsideration must be achieved through community input and via the required council planning solutions established in the Brimbank area.</p> <p>Regards [name redacted], Keilor Downs resident</p> |
| 35. | <p>Feedback: We are opposed to the baptcare housing project.</p> <p>How would we be affected: We have recently bought and moved to keilor downs. If we knew this housing project was going to occur before we bought we would not have bought our house and moved into the area. We think this will reduce the value of our house and increase chances of theft, disturbances, assaults and massively increase congestion. We would also feel less safe in the keilor central shopping centre. We feel we would also need to invest further into security measures around our house.</p> <p>There is also concern of the safety of children considering the proximity to a childcare centre.</p> <p>We are not alone in our thoughts and concerns as per the change.org petition objecting this proposal which has more than 1000 signatures at time of writing.</p> <p>https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilor-downs</p> |
| 36. | <p>Please see the below forwarded correspondence, for consideration.</p> <p>We (read: the respondents identified at Annex A of this document) are writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Baptcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. We live in Keilor Downs, many with young families and many who have been residents of Brimbank for over 20 years. Of this community there are those in various areas of employment, including professionals in the Health and Community Services sector with extensive experience and support the awareness of the needs of communities that the project would target.</p> <p>There are several key planning issues with the proposal we request consideration of and accordingly an appropriate response to, additionally supported by an exhaustive list on non-compliant and poorly considered planning solutions identified at Annex B of this document.</p> <p>Lack of Community Consultation and Culturally inclusive practice.</p> <p>We were informed about this proposal recently from our neighbours who live within 150 metres of the proposed construction, or via viewing of the obscurely located planning advice sign. Subsequently, a community consultation meeting about the proposal was conducted by Baptcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project (estimated at no more than 15</p> |

residents), as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area which isn't often frequented by foot and is not accessible by car, and is additionally over 150m from the construction location. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents and is also non-compliant to Clause 52.20 of which this development's proposal is based upon.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English, and additionally, no alternative language service is available to understand the planning information. Some residents were able to attend the recent consultation meeting with Baptcare via Zoom, however measures were not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project whom are not familiar with technology services. It was evident from the meeting that this demographic was not present, and their voice continues to not have been heard.

In addition to this, there has been no consideration of the COVID-19 restrictions that are placed on the communities in Melbourne and the subsequent difficulty in access to information relating to this development; being that the only publicly available information is the obscurely positioned sign. This is further evidenced by the community itself forming this document, of it's own volition, with almost all residents being made aware via word of mouth.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most residents are questioning the

transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above. To date, this information remains unavailable, unclear and unverified of fact.

We understand that Baptcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Baptcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Baptcare have changed their plan of building a retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected. This is further supported by the significant lack of community consultation.

Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Baptcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

We direct you to Annex A and Annex B of this document for the persons who oppose this development and further evidence of the non-compliance to Clause 52.20.

Annex A - Individuals who oppose this development

Please find at the following link over 1000 local residents who are opposed to this development. Each of these individuals is to be considered as a formal respondent to this objection and as such included in Baptcare's formal review paper than is supplied to the State Government or its Representatives in accordance with Clause 52.20 (Department of Health and Human Services or the Director of Housing)

Current petition for rejection: https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilor-downs?fbclid=IwAR10U3M1B4S21a_Z1SfZUc2lq1zQYOYb1U3GuFPfU0g0-Zw3V0P-Zmswlv

Annex B - Technical Assessment of Baptcare's Planning Reports

This assessment is generated from the following publically available reports:

<https://www.baptcare.org.au/services/housing/affordable-housing>

General Concerns:

This development is for 47 dwelling of unknown inhabitant numbers, however, it can be assumed that approximately 150 people will occupy this area. Given the significant numbers of inhabitants and dwellings being built, it is inappropriate that the distribution of advice relating to this build was only provided to a 150m radius of the build location. This is unlikely to have reached more than 15 dwellings. There will be significant impact to the surrounding area, including schools, public facilities (parks etc), community facilities (gyms/pools), retail and shopping facilities, of which the Keilor Downs community regularly utilise. The majority of the user community will remain unaware of this development. Furthermore it is with great disappointment that the COVID-19 restrictions were not taken into considerations, nor was the local council engaged for possible email sharing of this information. This has led to significantly inadequate sharing of the significance of 47 additional dwellings being built which would constitute the volume of dwellings along a 1km stretch of road in this area

This is inappropriate and requested to be addressed.

Given the type of dwellings and number, this will no doubt have a significant impact on the house values within a far greater radius than 150m. Initial assessments would indicate the impact to be to no less than 3km surrounding the development. This has not been addressed in the reports and consideration has not been provided to this effect.

This is inappropriate and must be addressed for the impacted community.

The general Social Housing policy of 'One in Nine' is a method of disbursing social housing tenants throughout the community. This is in recognition of best practice australia wide, being that people experiencing disadvantage are far more likely to move along the housing continuum and out of disadvantage when they are part of a socially diverse community: rather than collate the disadvantaged community together in a complex that, over time, will only erode and decay into another block of social housing 'flats' like those already existing around areas of Melbourne. Additionally, the City's own policy, requires any development not subject future occupants to undesirable levels of disturbance and/or nuisance.

n addition to para 3. This development will house disadvantaged individuals in a single location further putting pressure on community well being.

This is non-compliant with Clause 21.03-1.

Given the impact of social housing on local emergency services, and the significant number of new dwellings being built, there has been no review or consideration on the demand for local emergency services.

This is a significant oversight.

The location of the development is in a Commercial Zone 1.

This is non-compliant inconsistent with the normal General Residential or Residential Growth Zone requirements to produce high density dwellings (ref Clause 21.02)

Town Planning Report Concerns:

The development of 47 dwellings and estimated 150 inhabitants is likely to result in no less than approximately 60 cars (based on unit distributions). A single car park appears to be poorly assessed, despite it passing Clause 52.20 basic requirements.

The planning report notes that this project is developed adjacent to a proposed aged care facility (future). This appears to be inconsistent and provides no assessment of the future transport requirements for the land parcel.

Clause 15.01-2S: Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.
Non-compliant. Property values will be significantly impacted. The proposed dwellings are inconsistent with all properties in the local area (proposed are high density - existing are not high density). incomplete consideration of parking requirements (only 47 spaces provided, well below assessed inhabitant requirements).

Clause 15.01-5S: Pattern of local urban structure and subdivision. Heritage values and built form that reflect community identity.

Non-compliant. There has been no consideration of the local housing representation which have existed for over 50 years. The new development is inconsistent in size/look/feel of the entire suburb.

Clause 21.02-3: Apply the Commercial 1 Zone to facilitate retail uses and mixed use development consistent with the primary purpose of the zone.

Non-compliant. This development is only residential in purpose. There is zero foreseeable consideration for this clause in the development. It has not been addressed.

Clause 21.04: Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.

Non-compliant. The significance of moving from large parcel property of single dwellings immediately to high density dwellings is inconsistent.

Section 6.1: These statements are inconsistent with the requirements of Commercial Zone 1 and do not appear to be logical. Further detail and a re-write of the presented statements is essential.

Non-Compliant. There is no logic to the proposed project achieving any of the requirements of this Commercial Zone 1 requirements.

Section 6.3: Incorrectly states that this site is not subject to the Special Building Overlay.

Non-Compliant. All Land data states clearly that this site is subject to DCPO - Development Contributions Plan Overlay - Schedule 2, DPO - Development Plan Overlay - Schedule 2, **SBO - Special Building Overlay**. Significant oversight on the planning report.

Section 6.5: Car parking assessment has been poorly conducted as previously stated throughout this correspondence.

Section 7.1: Brimbank Planning Policy Framework assessments: There is no assessment of the Keilor Downs Urban Design Framework document.

This appears to be a significant oversight.

Section 7.2: Land use. The statements here are inconsistent with the Commercial Zone 1 framework as previously explained in General Concerns 6. The large scale of proposed density may be appropriate for the proximity to the shopping area, but it is not consistent with a smooth transition between the low density dwellings immediately adjacent to the area.

This appears to be a significant oversight.

Section 7.8: As previously stated throughout this Correspondence, the stated allocation of parking is inconsistent and appears to be poorly calculated. This will undoubtedly result in additional parking outflows into the general residential area.

General: Of the Town Planning Report, there is a significant non-compliance that has been observed. From Clause 52.20-04: **Consultation requirements** *Before the use or development commences: Public consultation, and consultation with the relevant municipal council, must be undertaken. A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to must be prepared to the satisfaction of the responsible authority*

Non-Compliant. Public information sharing appears to have been poorly conducted, with sharing of relevant data and planning information to the community of Keilor Downs being assessed as significantly inappropriate. There has been little effort to share information with only a 150m radius of residential sites being advised of such a large build with implications to the wider community being ignored. The majority of the community has only been able to find the relevant information via the physical standing advice board at the site. Noting the impacts of COVID-19 and the relevant restrictions, this can only be reviewed as poorly considered and completely void of community impact assessment.

Transport Impact Assessment Concerns:

Parking assessments and driving assessments from the annexes of the document (by Onemilegrid). These parking diagrams show a barely achievable parking assessment, additionally is of note the 'impact' to the internal garage space with each vehicle diagram showing that the standard vehicle diagrams cannot fit within the garage. This is not consistent or appropriate with a reasonable assessment of parking conditions. Entry has not been considered. The presented turning radii do not appear to be achievable (specifically the 'red' vehicle in the diagram at Figure 1)

This is inappropriate and inconsiderate, additionally it can be considered unsafe.

Figure 1 - Extract from Baptcare Public Reports

Conclusion:

In accordance with the exhaustive list of non-compliant, inappropriate and inconsistent statements in the provided reports, supported by the list of general concerns and poor circulation of information relating to the project providing clear non-compliance to sections required to get to this stage of planning as follows:

52.20-1

52.20-3

52.20-4

52.20-6.4

We request cancellation of this proposal and that reconsideration of the future planning in the area is conducted in a manner which is commensurate to and supportive of the local community needs. All reconsideration must be achieved through community input and via the required council planning solutions established in the Brimbank area.

37. Dear Phil and Helen,

I write to you on behalf of Owners Corporation 809286U – 7B Copernicus Way, Keilor Downs.

A majority of owners at the above-mentioned property are not in support of the affordable housing proposal. They believe the development will cause several negative impacts to the surrounding neighbours.

Parking:

7B Copernicus Way currently faces a significant issue with parking, the addition of more housing is only predicted to exacerbate the issue. The addition of 47 new affordable dwellings on top of the new developments at 7B are expected to create a condensed area which is likely to lead to emergency services safety issues.

Safety:

Some owners have expressed safety concerns. They have advised that the area already contains members of the public that cause issues. Residents have explained that the actions and behaviours of some members of the public causes an apprehension of fear. Residents are fearful that the affordable housing development could attract more of this negative and fearful behaviour, making them feel unsafe in their own homes.

Property Value:

Owners have expressed the fear that their homes will go down in significant value due to the proximity to the affordable housing development. The townhouses at 7B Copernicus Way are new developments, owners cannot afford for the value to significantly drop less than a year after purchase. Many owners were not aware of the idea to build affordable housing before they purchased the property, many have expressed that they would not have purchased knowing this information.

We hope you take the above points into consideration.

On behalf of Owners Corporation 809286U – 7B Copernicus Way, Keilor Downs.

[name redacted]
Portfolio Executive
Engine Property Group

38.

Dear all,

I raise to you today a significant and exhaustive set of major concerns that the Keilor Downs community (read - Over 1000 petition signatures, both physical and electronic, noted in Annex A of the attachment) are providing to you regarding the development at 21A Copernicus Way, Keilor Downs. It is our expectation that each of the 1000+ respondents are included as a formal delivery of opposition to this development.

The issues contained in my attached assessment document are exhaustive, ranging from the significant lack of community consultation to unacceptable and worrying non-compliances with extant planning regulations and Clause 52.20 as well as inconsistencies and inaccuracies throughout the publicly available planning documentation. On this basis alone the development is requested to be halted.

Above all of this, is the deeply concerning lack of consideration for the local community, including the vulnerable and elderly, who make up a large percentage of the Keilor Downs residents. These people have been ignored, and it could be suggested that they were avoided, from clear communication on the development intentions discussed. Further to this, the COVID-19 restrictions, imposed by this State Government, appear to have been absent from the considerations during this process and the inability for the community to be made aware of this development remain aberrantly evident.

Further concern with the proposed project is the basis of the homelessness data in which the location is recommended. We have found the data at the government's ABS repository (Ref 2.) shows that Keilor downs, and most of the surrounding suburbs, are resident to very low numbers of homelessness (under 32 records, this is inline with most surrounding suburbs such as Taylors Lakes, Taylors Hill, Keilor, Keilor East etc). This is not consistent with placing 'at risk' residents in a location which is suitable for

enabling them to progress with their lives. It is contrary to the intent of social housing as this will place residents far from their current likely residence (such as Sunshine, Sunshine West with over 200 records of homelessness) and away from their known community and essential services. This appears to be inconsistent with the approach detailed within the planning documentation and the overall intent of new Social Housing.

The information found is contrary to the local Council of Brimbank Meeting (19 October 2021) in which the Council stated, on multiple occasions, that "this area is subject to some of the highest rates of homelessness in Victoria". Not only does this show a poorly prepared Council, but an uneducated Council which is out of touch with its community. Further to my concern is the significant lack of review and knowledge of our local council members, specifically Mayor Rasic lack of leadership and Deputy Mayor Nguyen's incorrect statements. The Deputy Mayor and multiple Councillors showed a significant lack of understanding of the proposed build where questions were posed to the forum which included but was not limited to:

- Whether the proposal was for 'Social housing' or 'Affordable Housing';
- How many dwellings were proposed;
- The proposed number of levels which were to be built;
- The location of the build;
- The proposed changes to the surrounding land which retains approvals for further developments; and
- Which housing company was providing the planning documentation and executing the project.

Due to the above reasons, I have significant doubt that the minutes released at Ref 1, were completed with accuracy and due process given the unconscionable lack of understanding presented by this local Council.

Note that over 1000 responses have been received to object to this development which, due to COVID-19 restrictions, excludes many of the vulnerable and elderly as simple door knocking services are effectively unable to be conducted by this community to support their needs as this development and State Government appears to have forgotten that their opinion matters.

For these reasons, and the detailed information attached, I request your support to re-consider the development and its purpose in Keilor Downs. These decisions must be made with the appropriate level of Community engagement, rather than a ham-fisted approach to a solution which is inconsistent with the Keilor Downs regular and well established planning requirements which are able to be avoided due to the poorly written Clause 52.20.

Regards,

[name redacted] and 1000+ residents of Keilor Downs, Melbourne 3038
Contactable via this email address or via phone on 0439 377 912.

References:

1. Brimbank Council Meeting Minutes (19 October 2021)

<https://www.brimbank.vic.gov.au/council/council-meetings/2021-council-meeting-agendas-and-minutes>

<https://www.youtube.com/playlist?list=PLEw1sHlvzDqGbW0KNATAvzD29bhvIDIB> (note: Recording is yet to be uploaded)

2. ABS Census of population and housing estimating homelessness

<https://www.abs.gov.au/statistics/people/housing/census-population-and-housing-estimating-homelessness/2016>

39.

Having grown up in Keilor Downs (approx 27 years) im absolutely appalled & horrified that such dangerous & invasive development could be proposed let alone bypass basic planning protocols in comparison to other residential developments such as unit subdivisions. I also question how compliant the design is under siting regulations? This development is inappropriate for this area. The area has seen positive gentrification over the last few years with young families moving into the area. My brother who has always lived in the area also became part of this trend by purchasing a house with his wife so he could live close by to our parents. Going into the future the long term older residents (including my parents) would benefit much more if this site was turned into nursing home or retirement village so older people can downsize and comfortably remain in an area which they are familiar and which is still safe due to the mass exodus of low socio economic demographic that infiltrated the area 10 or so years ago. Keilor Downs has returned to Grand & Family orientated area. It should be kept that way.

Hi Phil,

I wish to raise the following concerns:

As Baptcare have submitted town planning application for Aged Care Home north of the Social Housing complex, i.e. between the housing development and Copernicus Way, why is there no connection / integrations between the two precincts as both will be owned and managed by Baptcare? I would like the town planning application they have submitted for the retirement home sent to me so i can review

Master Plan should be provided for public view as there is third 'triangular' subject site east with its future use still to be confirmed.

The community has right to understand how this entire site owned by Baptcare is to be developed over time and the long term impact of its use on them going into the future including the value of their houses and the impact on their safety as well as their amenity including the fact that the surrounding area is currently used as thoroughfare between the shopping centre and surrounding neighbourhood

Has there been Rescode Assessment completed under Clause 55.20, similar to Clause 54/55 Assessment as well as Traffic Management Plan / Report been prepared?

I have serious concerns about the following clauses:

52.20-7.17 Integration with the street, as part of decision guidelines the responsible authority must consider any relevant neighbourhood character objective, policy or statement set out in this scheme as well as the design response.

52.20-6.4 Safety All aspects of this Clause

52.20-6.7 Carparking, which does not correlate with Standards B15 & B16 under Clause 55, In particular the deviation from the standard rule of: 1 carspace for 1-2 bedroom dwelling and 2 carspaces for 3+ bedroom dwelling

The design also is questionable in terms of **Safety**: Car Parking must be well lit and clearly signed. The design of carparks must maximise natural surveillance and pedestrian visibility from adjacent buildings.

I would also want to see evidence of compliance with turning circles as well as any designated visitor parking which will further increase traffic within the confined and constricted development and on nearby streets

Has there been Garden Area Plan provided? Is min 25% Garden Area achieved for each dwelling?

How many dwellings are proposed in this development?

As part of 52.20-4 Consultation Requirements i request that Report which summaries the Consultation undertaken, feedback received and explains how the feedback has been considered and responded to be provided to me.

Furthermore as per 52.20 the purpose of 52.20 is to ensure that development does not unreasonably impact on the amenity of the adjoining dwellings

It would also be appreciated if Homes Victoria guidelines could be sent to me for reference as well as clarification of what their role is in this situation?

40. Hello,

Please find attached a letter detailing my concerns in relation to Baptistcare affordable housing to be located at No. 21 Copernicus Way in Keilor Downs.

I and other residents of Keilor Downs implore you to take our concerns seriously.

Thank you for taking the time to read my email and I look forward to hearing from you.

Kind regards

41. **Re: Baptistcare development of 21A Copernicus Way, Keilor Downs**

We (read: the respondents identified at Annex A of this document) are writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Baptistcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. We live in Keilor Downs, many with young families and many who have been residents of Brimbank for over 20 years. Of this community there are those in various areas of employment, including professionals in the Health and Community Services sector with extensive experience and support the awareness of the needs of communities that the project would target.

There are several key planning issues with the proposal we request consideration of and accordingly an appropriate response to. Additionally supported by an exhaustive list on non-compliant and poorly considered planning solutions identified at Annex B of this document.

Lack of Community Consultation and Culturally inclusive practice.

We were informed about this proposal recently from our neighbours who live within 150 metres of the proposed construction, or via viewing of the obscurely located planning advice sign. Subsequently, a community consultation meeting about the proposal was conducted by Baptcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project (estimated at no more than 15 residents), as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area which isn't often frequented by foot and is not accessible by car, and is additionally over 150m from the construction location. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents and is also non-compliant to Clause 52.20 of which this development's proposal is based upon.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English, and additionally, no alternative language service is available to understand the planning information. Some residents were able to attend the recent consultation meeting with Baptcare via Zoom, however measures were not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project whom are not familiar with technology services. It was evident from the meeting that this demographic was not present, and their voice continues to not have been heard.

In addition to this, there has been no consideration of the COVID-19 restrictions that are placed on the communities in Melbourne and the subsequent difficulty in access to information relating to this development; being that the only publicly available information is the obscurely positioned sign. This is further evidenced by the community itself forming this document, of its own volition, with almost all residents being made aware via word of mouth.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals

are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above. To date, this information remains unavailable, unclear and unverified of fact.

We understand that Baptcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Baptcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Baptcare have changed their plan of building a retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected. This is further supported by the significant lack of community consultation.

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The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although

the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Baptcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

We direct you to Annex A and Annex B of this document for the persons who oppose this development and further evidence of the non-compliance to Clause 52.20.

Annex A - Individuals who oppose this development

Please find at the following link over 1000 local residents who are opposed to this development. Each of these individuals is to be considered as a formal respondent to this objection and as such included in Baptcare's formal review paper than is supplied to the State Government or its Representatives in accordance with Clause 52.20 (Department of Health and Human Services or the Director of Housing)

Current petition for rejection: https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilor-downs?fbclid=IwAR10U3M1B4S21a_Z1SfZUc2lq1zQYOYb1U3GuFPifU0q0-Zw3V0P-Zmswiw

Annex B - Technical Assessment of Baptcare's Planning Reports

This assessment is generated from the following publically available reports:

<https://www.baptcare.org.au/services/housing/affordable-housing>

General Concerns:

1. This development is for 47 dwelling of unknown inhabitant numbers, however, it can be assumed that approximately 150 people will occupy this area. Given the significant numbers of inhabitants and dwellings being built, it is inappropriate that the distribution of advice relating to this build was only provided to a 150m radius of the build location. [REDACTED]
[REDACTED]. There will be significant impact to the surrounding area, including schools, public facilities (parks etc), community facilities (gyms/pools), retail and shopping facilities, of which the Keilor Downs community regularly utilise. The majority of the user community will remain unaware of this development. [REDACTED]
[REDACTED]
a. This is inappropriate and requested to be addressed.
2. Given the type of dwellings and number, this will no doubt have a significant impact on the house values within a far greater radius than 150m. Initial assessments would indicate the impact to be to no less than 3km surrounding the development. This has not been addressed in the reports and consideration has not been provided to this effect.
a. This is inappropriate and must be addressed for the impacted community.
3. The general Social Housing policy of 'One in Nine' is a method of disbursing social housing tenants throughout the community. This is in recognition of best practice australia wide, being that people experiencing disadvantage are far more likely to move along the housing continuum and out of disadvantage when they are part of a socially diverse community: rather than collate the disadvantaged community together in a complex that, over time, will only erode and decay into another block of social housing 'flats' like those already existing around areas of Melbourne. Additionally, the City's own policy, requires any development not subject future occupants to undesirable levels of disturbance and/or nuisance.
4. In addition to para 3. This development will house disadvantaged individuals in a single location further putting pressure on community well being.
a. This is non-compliant with Clause 21.03-1.
5. Given the impact of social housing on local emergency services, and the significant number of new dwellings being built, there has been no review or consideration on the demand for local emergency services.
a. This is a significant oversight.
6. The location of the development is in a Commercial Zone 1.

- a. **This is non-compliant** inconsistent with the normal General Residential or Residential Growth Zone requirements to produce high density dwellings (ref Clause 21.02)

Town Planning Report Concerns:

1. The development of 47 dwellings and estimated 150 inhabitants is likely to result in no less than approximately 60 cars (based on unit distributions). A single car park appears to be poorly assessed, despite it passing Clause 52.20 basic requirements.
2. The planning report notes that this project is developed adjacent to a proposed aged care facility (future). This appears to be inconsistent and provides no assessment of the future transport requirements for the land parcel.
3. Clause 15.01-2S: Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.
 - a. **Non-compliant.** Property values will be significantly impacted. The proposed dwellings are inconsistent with all properties in the local area (proposed are high density - existing are not high density). incomplete consideration of parking requirements (only 47 spaces provided, well below assessed inhabitant requirements).
4. Clause 15.01-5S: Pattern of local urban structure and subdivision. Heritage values and built form that reflect community identity.
 - a. **Non-compliant.** There has been no consideration of the local housing representation which have existed for over 50 years. The new development is inconsistent in size/look/feel of the entire suburb.
5. Clause 21.02-3: Apply the Commercial 1 Zone to facilitate retail uses and mixed use development consistent with the primary purpose of the zone.
 - a. **Non-compliant.** This development is only residential in purpose. There is zero foreseeable consideration for this clause in the development. It has not been addressed.
6. Clause 21.04: Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.
 - a. **Non-compliant.** The significance of moving from large parcel property of single dwellings immediately to high density dwellings is inconsistent.
7. Section 6.1: These statements are inconsistent with the requirements of Commercial Zone 1 and do not appear to be logical. Further detail and a re-write of the presented statements is essential.
 - a. **Non-Compliant.** There is no logic to the proposed project achieving any of the requirements of this Commercial Zone 1 requirements.
8. Section 6.3: Incorrectly states that this site is not subject to the Special Building Overlay.
 - a. **Non-Compliant.** All Land data states clearly that this site is subject to DCPO - Development Contributions Plan Overlay - Schedule 2, DPO - Development Plan Overlay - Schedule 2, **SBO - Special Building Overlay.** Significant oversight on the planning report.
9. Section 6.5: Car parking assessment has been poorly conducted as previously stated throughout this correspondence.

10. Section 7.1: Brimbank Planning Policy Framework assessments: There is no assessment of the Keilor Downs Urban Design Framework document.
 - a. **This appears to be a significant oversight.**
11. Section 7.2: Land use. The statements here are inconsistent with the Commercial Zone 1 framework as previously explained in General Concerns 6. The large scale of proposed density may be appropriate for the proximity to the shopping area, but it is not consistent with a smooth transition between the low density dwellings immediately adjacent to the area.
 - a. **This appears to be a significant oversight.**
12. Section 7.8: As previously stated throughout this Correspondence, the stated allocation of parking is inconsistent and appears to be poorly calculated. This will undoubtedly result in additional parking outflows into the general residential area.
13. General: Of the Town Planning Report, there is a significant non-compliance that has been observed. From Clause 52.20-04: **Consultation requirements** Before the use or development commences: Public consultation, and consultation with the relevant municipal council, must be undertaken. A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to must be prepared to the satisfaction of the responsible authority
 - a. **Non-Compliant.** Public information sharing appears to have been poorly conducted, with sharing of relevant data and planning information to the community of Keilor Downs being assessed as significantly inappropriate. There has been little effort to share information with only a 150m radius of residential sites being advised of such a large build with implications to the wider community being ignored. The majority of the community has only been able to find the relevant information via the physical standing advice board at the site. Noting the impacts of COVID-19 and the relevant restrictions, this can only be reviewed as poorly considered and completely void of community impact assessment.

Transport Impact Assessment Concerns:

Parking assessments and driving assessments from the annexes of the document (by Onemilegrid). These parking diagrams show a barely achievable parking assessment, additionally is of note the 'impact' to the internal garage space with each vehicle diagram showing that the standard vehicle diagrams cannot fit within the garage. This is not consistent or appropriate with a reasonable assessment of parking conditions. Entry has not been considered. The presented turning radii do not appear to be achievable (specifically the 'red' vehicle in the diagram at Figure 1)

- a. **This is inappropriate and inconsiderate, additionally it can be considered unsafe.**

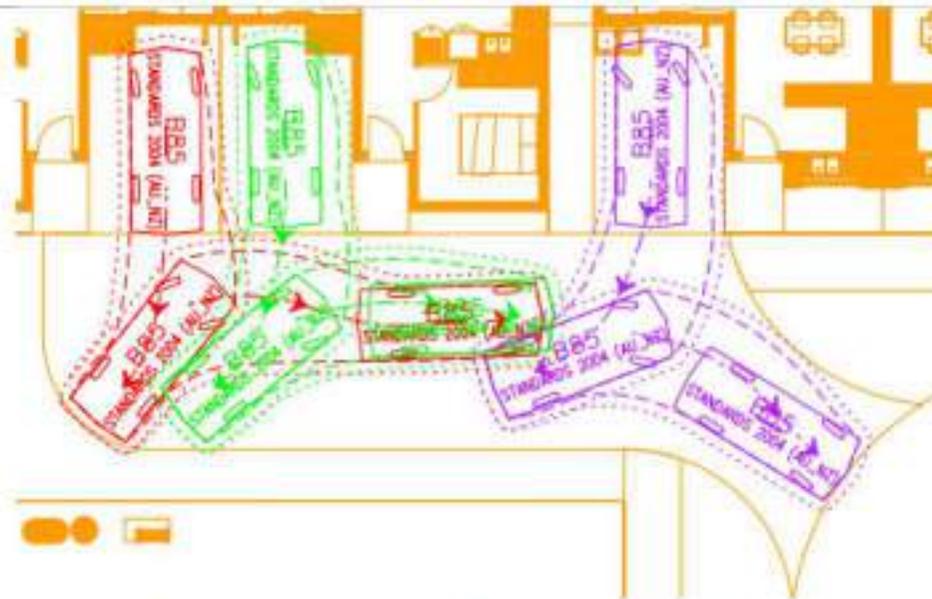


Figure 1 - Extract from Baptcare Public Reports

Conclusion:

In accordance with the exhaustive list of non-compliant, inappropriate and inconsistent statements in the provided reports, supported by the list of general concerns and poor circulation of information relating to the project providing clear non-compliance to sections required to get to this stage of planning as follows:

1. 52.20-1
2. 52.20-3
3. 52.20-4
4. 52.20-6.4

We request cancellation of this proposal and that reconsideration of the future planning in the area is conducted in a manner which is commensurate to and supportive of the local community needs. All reconsideration must be achieved through community input and via the required council planning solutions established in the Brimbank area

42.

Dear Minister Wynne,

Re: Baptcare development of 21A Copernicus Way, Keilor Downs

I am writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Baptcare Affordable Housing Project to construct 47 units at No. 21A

Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. I live in Keilor Downs with my young family and have been a resident of Brimbank for over 20 years. I am currently employed as a professional in the Health and Community Services sector with over 25 years' experience and am aware of the needs of communities that the project would target. There are several key planning issues with the proposal I would ask you consider and respond to accordingly.

Lack of Community Consultation and Culturally inclusive practice.

I was informed about this proposal recently from a neighbour whose parents live within 150 metres of the proposed construction. Subsequently, a community consultation meeting about the proposal was conducted by Bapcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project, as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area which isn't often frequented by foot and is not accessible by car. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English. Some residents were able to attend the recent consultation meeting with Bapcare via Zoom, however measures were not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project. It was evident from the meeting that this demographic was not present, and their voice not heard.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An

assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs.

Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptistcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above.

We understand that Baptistcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Baptistcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Baptistcare have changed their plan of building a retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being

aligned with the needs of the communities affected.

Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Baptistcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

Thank you for considering this submission and I look forward to your response either via mobile on [redacted] or email [redacted]

43. Dear Phil and Helen,

We are residents of Aspect Residence townhouses, an adjacent development to the Affordable Housing development. We are not in support of the affordable housing proposal as we will be directly and negatively impacted for the below reasons:

1. Traffic generation and parking - with 47 units and 150+ residents estimated for this new tiny pocket, parking will present a challenge, especially when having visitors. We currently face a significant issue with parking in the area.
2. Infrastructure uplift will be required – who will be responsible and accountable?
3. Resource uplift – Police resourcing has never been a priority by the local or state government for 3038 – even with continued residential growth. Western Councils have 1 Police Officer for every 1600 residents compared to Eastern Councils who have 1 Police Officer for every 800 residents.
4. Bapcare stated a survey or studies have concluded this is a requirement in our neighbourhood – we request the opportunity to review these surveys and the foundations of which have concluded this statement?
5. A change to the atmosphere and amenity of our area (for the worse) and impact on the character of the neighbourhood is in question.
6. Similar recent developments of this type - low rise/ high density with lower socio-economic demographics have led to a significant uplift in shoplifting, petty crime, begging, aggressive and disruptive behaviour, and drug and alcohol abuse which has a detrimental effect especially when located adjacent to shopping centres. Have any surveys into this type of behaviour or problems been carried out by the developer or planners? If so, we request to review the results.
7. Waste Management and Essential Services have not been considered.
8. Safety for our community is a concern.
9. For many residents in 3038, English is their second language – this means poor communication and notices have hindered our opportunity to review proposals.
10. The site was originally proposed to be an aged care facility when sold in 2016, but the \$150 Million Housing Grant announced by the State Government has obviously changed their proposal to Affordable Housing.
11. We were not aware of the idea to build affordable housing before we purchase our property at 7B Copernicus way. We wouldn't have purchased it knowing this information.
12. We fear our home will go down in significant value due to the proximity to the affordable housing development. We cannot afford for the value to significantly drop less than a year after purchase, it will create financial distress for us.
13. Our Local Council have not been consulted on the matter

14. The proposed development is immediately adjacent to a child care facility, within approx. 400 metres of the local playgroup facility, leisure centre and skate park.
15. We currently have significant constraints with childcare and kindergarten facilities, this will load the burden, We also have a shortage of carers in our area and this development will just create an overload
16. Permit Signage has been placed in less than obvious locations, thereby reducing the opportunity for residents to have knowledge of this proposal, and to lodge objections or otherwise. Apparently, the developer was only required to advise residents within 150 metres of the site, severely limiting the wider community's knowledge of the proposal.

We hope you take the above points into consideration

44. Hi Phil ,

My name is [redacted] and I moved to the Keilor Downs area at the start of this year, living within the Aspect Residence, behind the Keilor Downs plaza and is in close proximity to this affordable housing proposal. Had I known about this proposal, I would not have purchased my home. When I purchased my home I was told this site was going to be a retirement village.

I have significant concerns with this proposal including:

- Parking is already a considerable issue within the Aspect residence. Adding this development is only going to exacerbate this issue further.

- Through my employment, I have extensive experience in dealing with people who live in these types of housing. Whilst it would be unfair to tar all the people who live in affordable housing with the same brush, my experience over many years has exposed me to many people who live in these developments who are more susceptible to illicit substance/ alcohol abuse, significant mental health issues, family violence issues, anti social behaviour, law/ rule breaking. My concern is that this will increase the crime rate in the area and that not only are there not enough police in the area, there is a distinct lack of support services in the area for the aforementioned issues.

These types of proposals do attract people recently released from jail who are either straight released, or subject to parole or court ordered supervision. Research shows that those that are released from custody are at a higher risk of re-offending in the first 3 months following their release and thus my concern of an increased crime rate and safety of fellow residents, people that visit the shopping centre and as noted above, attract anti social behaviour at the shopping centre. It would be good to know if Baptistcare will be providing any additional support services to try to counteract these issues.

- I am also concerned that this proposal will affect the value of my home in the future.

Thanks

45. Dear Premier, Ministers, Mayor, Councillors and Mr Gleeson,

This proposal only came to my attention recently as I drove past and saw a small and obscure sign regarding the proposed development on Copernicus Way. I have since done some research to find that over 1300 local residents have signed a petition objecting to the development and now I have joined this effort also by signing it.

1. Firstly I don't think adequate notification and consultation has been done with the community regarding this proposed development. My mother who lives further down on Copernicus was not informed via letter or otherwise and is shocked that such a development would be proposed without consulting with

her as it would directly effect her. She is elderly and English is not her first language and dare I say this is the case for numerous others in the local vicinity. This process has not been sensitive to the demographic of this area, elderly and culturally diverse with English as their second language. I've lived in Brimbank all my life, and lived in Milas Court, behind the proposed development for many years, my previous neighbours that still live there were also not made aware. Shouldn't adequate consultation be done to hear the views of all affected parties? The Pandemic and covid restrictions has also placed further difficulties in accessing information. I don't think the majority of residents are aware of the prosed development.

2. Secondly the forums I have been on discuss the claim from Baptcare that local residents are the proposed new residents of this development. Are they saying only people living in Keilor Downs already, are relocating to the new development? I'd like to see evidence of this. I was also informed that Baptcare also claim the eligible residents stated Keilor Downs as their first preference. Again where is the data substantiating this claim?

3. I am not opposed to affordable housing, however the large number of 47 being proposed is high and would adversely effect the community. It would cause congestion and traffic and put strain on already limited resources and adversely effect other vulnerable communities within the region. Lack of public transport infrastructure, primary health services with long waiting lists, child-care services already stretched to meet demand etc. I have worked for several years with the local community in the past as the Brimbank Health Promotion Officer for then named ISIS Primary Care, so I am well versed in the issues that my community faces and the scarce resources available to them. Im afraid such a development will only further decrease the health and well being of this vulnerable community. Brimbank has a high ageing population, high CALD population and low socio-economic status (SES). Wouldn't an aged care facility be a more appropriate development that would meet the needs of the community?

To sum up, clustered low income housing is not in the best interests of the residents of Keilor Downs. The proposed developers have not consulted adequately with local residents. Baptcare have not given adequate consideration to the existing challenged faced already by the ageing, low SES community already accessing scarce resources. I know these sentiments are not only mine but those shared by many others. Adequate consultation would have uncovered this. This propped development is not suitable for this area.

Thank you for taking the time to read and consider my concerns.
Resident of Keilor

46. Dear Phil,

My name is [redacted] and I am a resident of Keilor Downs. I OBJECT to the proposed project at No.21A Copernicus Way Keilor Downs. Our Council resources are completely overwhelmed and they were, even prior to the Aspire housing that is in the process of getting built, across the field. Thank you for your time and please VOTE AGAINST the proposal.

God Bless

47. Good morning,

I have been seeing lots of people against this housing project on social media.

I live in Keilor Downs and I just want to say that it's a great idea to have affordable housing in this area and I really hope it goes ahead.

While this pandemic has brought economic social and financial problems to the community, it's good to hear that the Victorian government with baptcare have joined to try to make this happen.

Good luck and I hope this goes ahead for the community that are in need of a helping hand during these tough times.

| | |
|-----|---|
| | Kind regards |
| 48. | <p>Dear Madame,</p> <p>I am writing to you about Baptcare's High Density Housing Project in Keilor Downs . I strongly object to this plan for several reasons:</p> <ol style="list-style-type: none"> 1. Traffic Generation – with new housing in progress – how can we complete any studies or have real data on how this will impact our community 2. Where will people park? With 47 units and 150+ residents estimated for this small land, parking will present a challenge 3. Baptcare have hidden the Permit Signage – a shady tactic so residents cannot object 4. Infrastructure uplift – whom will be responsible and accountable? 5. Resource uplift – Police resourcing has never been a priority by the local or state government, for 3038 – even with continued residential growth. West has 1 Police Office for every 1600 residence compared to Eastern Councils who have 1 Police Officer for every 800 residences. THAT IS A 50% GAP IN SUPPORT 6. Mental Health Support for our existing residence is below average, especially during these unprecedented times. We are witnessing a high rate of mental health issues in our community and these are not being addressed nor supported by our Local and State Government. An increase in vulnerable residence is only going to place more pressure on the Mental Health System. We request transparency around accountability and responsibility to address these concerns and a formalized plan, prior to high-density planning is considered. 7. Baptcare stated a survey or studies have concluded this is a requirement in our neighborhood – we request to review these surveys and the foundations in which have concluded this statement? 8. A change to the atmosphere of area (for the worse) and impact on the character of the neighborhood is in question 9. The area is subject to overdevelopment 10. SAFETY – for our community is a concern, being so close to the plaza, late-night shopping and other concerns with vulnerable individuals could pose issues 11. For most residences, English is their Second Language – this means poor communication and notice has hindered our opportunity to review proposals 12. Our LOCAL COUNCIL have been silent on the matter 13. Was proposed to be an aged-cared facility when sold in 2016, but the 150 million Housing Grant announced by the State Government has obviously changed their proposal to Social Housing 14. We currently have Constraints with Childcare and Kindergarden facilities, and this will load the burden. 15. We have a shortage of Carers in our area, this will just create an overload 16. Existing issues should be resolved before they create more chaos <p>As a member of your electorate, I'm asking that you review Baptcare planning proposal. Specifically, I ask that you give due consideration to reject this planning. I urge you to ensure that your party will listen and show your empathy to Keilor Downs Community. Thank you for your time in this matter.</p> <p>Yours sincerely</p> |
| 49. | <p>Surely the old Nestlé factory in St Albans would be a better spot.</p> <p>Trains, shop varieties</p> |
| 50. | Dear Madam/Sir |

I object to the proposed affordable housing development in Keilor Downs.

The schools are at breaking point, filled to capacity with a high number of already vulnerable children. The gps are at breaking point looking after many people with a hugely diverse background from 40 different nationalities underrepresented. Sunshine hospital is also on the verge of collapse with people waiting in ambulances for over 8 hours. Lack of transport, the bus takes 40 minutes to get to the train station, no parking at the train station and lack of services. Aged care is sub par and there is no mental health support, no youth support, no youth services. Lack of jobs in the area. Older hard working neighbourhood.

The suburb is already struggling at capacity and poverty is settling in with many people with mental health issues and no jobs, on the street and begging for money.

Please reconsider an alternate area.

Regards

51. Good afternoon

A number of residents have recently been notified there is a proposed 47 unit housing project at 21A Copernicus way and concerned about a number of points, including;

1. How the government reached a .6 car spaces per unit when the standard is 1 for all other projects
2. Why the consultation process is being held during a lockdown when most residents will not see any advertised boards
3. Why only one board has been erected where 75% of the 150 metre notification zone is vacant land
4. How was a decision made to inform the immediate area by only including 150 metres and not the immediate streets which will potentially see increase in traffic etc:
5. We would also like to know, when was this legislation passed? According to the documents, it has been in place since December 2020. When was legislation introduced and passed?
6. The residents would like to see a list of all similar projects proposed for other areas. Ie: is there one in Richmond, Armadale, Toorak, Brighton St. Albans.

We are concerned and want to know why this process is being undertaken during a lockdown where residents are unable to meet, talk, consider, suggest, object or properly question government decisions?

As there will be a discussion via a zoom meeting with URBIS in the coming days, we would appreciate your timely response.

52. Hello

I am emailing you regarding the proposed plans to build 47 affordable housing units on Copernicus Way Keilor Downs. I am totally against this proposal and today is the first time I have heard of this plan. The impact this would have on our area is catastrophic.

| | |
|-----|--|
| | <p>I have a been a resident in Keilor Downs for the last 10 years and have seen the area flourish beautifully. My kids go to school and kinder in Keilor Downs and my family and I feel very blessed to be able to live in such a lovely area.</p> <p>This plan to include 47 affordable housing units is actually quite shocking. As you're aware, our area has gone up considerably in terms of housing prices over the last few years. This will devalue our properties, bring more crime to the area and generally make Keilor Downs a second class suburb. Having these properties right near a shopping centre and child care centre is a recipe for disaster. I'm sure that if this plan is approved then there will be a mass exodus out of here. My family and I will definitely be seriously considering that.</p> <p>Given the ageing population in Keilor Downs, wouldn't it seem more feasible to use that empty land for a retirement village?</p> <p>I would appreciate a response as to how likely this will proceed and what the next steps are with this process. Thank you for your time.</p> |
| 53. | <p>Hi.</p> <p>Similar recent developments of this type - low rise/ high density with lower socio-economic demographics have led to a significant uplift in shoplifting, petty crime, begging, aggressive and disruptive behaviour, and drug and alcohol abuse which has a detrimental effect especially when located adjacent to shopping centres. Have any surveys into this type of behaviour or problems been carried out by the developer or planners? If so, we request to review the results.</p> <p>Our property value will drop.</p> |
| 54. | <p>Dear Helen,</p> <p>I am contacting you in relation to the recent news that Bapcare are planning a high density development behind Keilor Downs plaza in the vacant land across from the as-yet unfinished high density Aspect project.</p> <p>I wish to register my concerns regarding this for the following reasons:</p> <p>This is excessive, the Aspect high density project has not even yet been completed & this vacant land represents the only green space available to those residents- this would be better served being developed as outside space for those current & future residents.</p> <p>In addition, where are all these people expected to park & access surrounding roads? The Keilor Downs plaza is already jam packed as it struggles to service the fast growing community- in the current Covid climate we have to consider people's use of public spaces and if there are hundreds of ppl living on top of each other with no open green space, having to do their shopping shoulder to shoulder we are going to struggle to keep future outbreaks under control.</p> <p>This appears poorly considered & very rushed, only just becoming known recently with little opportunity for current residents to express their concerns. This is not an opposition to social housing, I am a Social Worker & more aware than most of the need & not blinded by the stereotype either, but rather a concern for current & future residents liveability- I sincerely hope there is to be more consultation with the community and transparency around how these decisions are being made.</p> <p>Yours sincerely,</p> |
| 55. | <p>We (read: the respondents identified at Annex A of this document) are writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Bapcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. We live in Keilor Downs, many with young families and many who have been residents of Brimbank for over 20 years. Of this community there are those in various areas of employment, including professionals in the</p> |

Health and Community Services sector with extensive experience and support the awareness of the needs of communities that the project would target.

There are several key planning issues with the proposal we request consideration of and accordingly an appropriate response to. Additionally supported by an exhaustive list on non-compliant and poorly considered planning solutions identified at Annex B of this document.

Lack of Community Consultation and Culturally inclusive practice.

We were informed about this proposal recently from our neighbours who live within 150 metres of the proposed construction, or via viewing of the obscurely located planning advice sign. Subsequently, a community consultation meeting about the proposal was conducted by Baptcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project (estimated at no more than 15 residents), as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area which isn't often frequented by foot and is not accessible by car, and is additionally over 150m from the construction location. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents and is also non-compliant to Clause 52.20 of which this development's proposal is based upon.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English, and additionally, no alternative language service is available to understand the planning information. Some residents were able to attend the recent consultation meeting with Baptcare via Zoom, however measures were not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project whom are not familiar with technology services. It was evident from the meeting that this demographic was not present, and their voice continues to not have been heard.

In addition to this, there has been no consideration of the COVID-19 restrictions that are placed on the communities in Melbourne and the subsequent difficulty in access to information relating to this development, being that the only publicly available information is the obscurely positioned sign. This is further evidenced by the community itself forming this document, of its own volition, with almost all residents being made aware via word of mouth.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is

made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above. To date, this information remains unavailable, unclear and unverified of fact.

We understand that Baptcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Baptcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Baptcare have changed their plan of building a retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected. This is further supported by the significant lack of community consultation.

Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although

the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Baptcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

We direct you to Annex A and Annex B of this document for the persons who oppose this development and further evidence of the non-compliance to Clause 52.20.

Annex A - Individuals who oppose this development

Please find at the following link over 1000 local residents who are opposed to this development. Each of these individuals is to be considered as a formal respondent to this objection and as such included in Baptcare's formal review paper than is supplied to the State Government or its Representatives in accordance with Clause 52.20 (Department of Health and Human Services or the Director of Housing)

Current petition for rejection: https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilor-downs?fbclid=IwAR10U3M1B4S21a_Z1SfZUc2lq1zQYOYb1U3GuFPfU0q0-Zw3V0P-Zmswiw

Annex B - Technical Assessment of Baptcare's Planning Reports

This assessment is generated from the following publically available reports:

<https://www.baptcare.org.au/services/housing/affordable-housing>

General Concerns:

1. This development is for 47 dwelling of unknown inhabitant numbers, however, it can be assumed that approximately 150 people will occupy this area. Given the significant numbers of inhabitants and dwellings being built, it is inappropriate that the distribution of advice relating to this build was only provided to a 150m radius of the build location. This is unlikely to have reached more than 15 dwellings. There will be significant impact to the surrounding area, including schools, public facilities (parks etc), community facilities (gyms/pools), retail and shopping facilities, of which the Keilor Downs community regularly utilise. The majority of the user community will remain unaware of this development. Furthermore it is with great disappointment that the COVID-19 restrictions were not taken into considerations, nor was the local council engaged for possible email sharing of this information. This has led to significantly inadequate sharing of the significance of 47 additional dwellings being built which would constitute the volume of dwellings along a 1km stretch of road in this area

a. **This is inappropriate and requested to be addressed.**

2. Given the type of dwellings and number, this will no doubt have a significant impact on the house values within a far greater radius than 150m. Initial assessments would indicate the impact to be to no less than 3km surrounding the development. This has not been addressed in the reports and consideration has not been provided to this effect.

a. **This is inappropriate and must be addressed for the impacted community.**

3. The general Social Housing policy of 'One in Nine' is a method of disbursing social housing tenants throughout the community. This is in recognition of best practice australia wide, being that people experiencing disadvantage are far more likely to move along the housing continuum and out of disadvantage when they are part of a socially diverse community; rather than collate the disadvantaged community together in a complex that, over time, will only erode and decay into another block of social housing 'flats' like those already existing around areas of Melbourne. Additionally, the City's own policy, requires any development not subject future occupants to undesirable levels of disturbance and/or nuisance.

4. In addition to para 3. This development will house disadvantaged individuals in a single location further putting pressure on community well being.

a. **This is non-compliant** with Clause 21.03-1.

5. Given the impact of social housing on local emergency services, and the significant number of new dwellings being built, there has been no review or consideration on the demand for local emergency services.

a. This is a significant oversight.

6. The location of the development is in a Commercial Zone 1.

a. **This is non-compliant** inconsistent with the normal General Residential or Residential Growth Zone requirements to produce high density dwellings (ref Clause 21.02)

Town Planning Report Concerns:

1. The development of 47 dwellings and estimated 150 inhabitants is likely to result in no less than approximately 60 cars (based on unit distributions). A single car park appears to be poorly assessed, despite it passing Clause 52.20 basic requirements.

2. The planning report notes that this project is developed adjacent to a proposed aged care facility (future). This appears to be inconsistent and provides no assessment of the future transport requirements for the land parcel.
3. Clause 15.01-2S: Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.
 - a. **Non-compliant.** Property values will be significantly impacted. The proposed dwellings are inconsistent with all properties in the local area (proposed are high density - existing are not high density). Incomplete consideration of parking requirements (only 47 spaces provided, well below assessed inhabitant requirements).
4. Clause 15.01-5S: Pattern of local urban structure and subdivision. Heritage values and built form that reflect community identity.
 - a. **Non-compliant.** There has been no consideration of the local housing representation which have existed for over 50 years. The new development is inconsistent in size/look/feel of the entire suburb.
5. Clause 21.02-3: Apply the Commercial 1 Zone to facilitate retail uses and mixed use development consistent with the primary purpose of the zone.
 - a. **Non-compliant.** This development is only residential in purpose. There is zero foreseeable consideration for this clause in the development. It has not been addressed.
6. Clause 21.04: Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.
 - a. **Non-compliant.** The significance of moving from large parcel property of single dwellings immediately to high density dwellings is inconsistent.
7. Section 6.1: These statements are inconsistent with the requirements of Commercial Zone 1 and do not appear to be logical. Further detail and a re-write of the presented statements is essential.
 - a. **Non-Compliant.** There is no logic to the proposed project achieving any of the requirements of this Commercial Zone 1 requirements.
8. Section 6.3: Incorrectly states that this site is not subject to the Special Building Overlay.
 - a. **Non-Compliant.** All Land data states clearly that this site is subject to DCPO - Development Contributions Plan Overlay - Schedule 2, DPO - Development Plan Overlay - Schedule 2, **SBO - Special Building Overlay**. Significant oversight on the planning report.
9. Section 6.5: Car parking assessment has been poorly conducted as previously stated throughout this correspondence.
10. Section 7.1: Brimbank Planning Policy Framework assessments: There is no assessment of the Keilor Downs Urban Design Framework document.
 - a. **This appears to be a significant oversight.**
11. Section 7.2: Land use. The statements here are inconsistent with the Commercial Zone 1 framework as previously explained in General Concerns 6. The large scale of proposed density may be appropriate for the proximity to the shopping area, but it is not consistent with a smooth transition between the low density dwellings immediately adjacent to the area.
 - a. **This appears to be a significant oversight.**
12. Section 7.8: As previously stated throughout this Correspondence, the stated allocation of parking is inconsistent and appears to be poorly calculated. This will undoubtedly result in additional parking outflows into the general residential area.

13. General: Of the Town Planning Report, there is a significant non-compliance that has been observed. From Clause 52.20-04: **Consultation requirements** *Before the use or development commences: Public consultation, and consultation with the relevant municipal council, must be undertaken. A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to must be prepared to the satisfaction of the responsible authority*

a. **Non-Compliant.** Public information sharing appears to have been poorly conducted, with sharing of relevant data and planning information to the community of Kellor Downs being assessed as significantly inappropriate. There has been little effort to share information with only a 150m radius of residential sites being advised of such a large build with implications to the wider community being ignored. The majority of the community has only been able to find the relevant information via the physical standing advice board at the site. Noting the impacts of COVID-19 and the relevant restrictions, this can only be reviewed as poorly considered and completely void of community impact assessment.

Transport Impact Assessment Concerns:

Parking assessments and driving assessments from the annexes of the document (by Onemilegrid). These parking diagrams show a barely achievable parking assessment, additionally is of note the 'impact' to the internal garage space with each vehicle diagram showing that the standard vehicle diagrams cannot fit within the garage. This is not consistent or appropriate with a reasonable assessment of parking conditions. Entry has not been considered. The presented turning radii do not appear to be achievable (specifically the 'red' vehicle in the diagram at Figure 1)

a. **This is inappropriate and inconsiderate, additionally it can be considered unsafe.**

Figure 1 - Extract from Baptcare Public Reports

Conclusion:

In accordance with the exhaustive list of non-compliant, inappropriate and inconsistent statements in the provided reports, supported by the list of general concerns and poor circulation of information relating to the project providing clear non-compliance to sections required to get to this stage of planning as follows:

1. 52.20-1
2. 52.20-3
3. 52.20-4
4. 52.20-6.4

We request cancellation of this proposal and that reconsideration of the future planning in the area is conducted in a manner which is commensurate to and supportive of the local community needs. All reconsideration must be achieved through community input and via the required council planning solutions established in the Brimbank area.

56. Hello, my name is [redacted] of [street number redacted] Fiat Court Keilor Downs. I have been a resident here for over 36 years. I wish to bring to your attention a major development being proposed in our community.

Baptcare Affordable Housing at 21A Copernicus Way, Keilor Downs

I received a letter from Brimbank Council the second week of October highlighting this development. To my disappointment only one side of our street was notified which left me to think...how many residents actually knew about this. In doing some research I discovered that letters were only sent to those residents within a 150metre radius from the proposed development. This leaves only a small pocket of residents as one side is the Shopping Centre, the other is the new Aquatic Centre (still under construction) and lastly an empty block of land. There was a hidden permit sign in an area where no traffic passes as it is a dead-end street at the end of Thornhill Drive. Being that this notice was only given around two weeks to dispute a lot of residents are probably not aware of this development. And yet we have around 1300 residents' sign the petition currently in place. Which is unfair for the elderly or their families to raise their voices. In this area you will find a lot of elderly with English being their second language they won't understand the concept of this development. In their plans they show the development being built on the Thornhill Drive, but yet their address indicates otherwise. Why is 21A Copernicus Way used as the proposed address?

When Brimbank Council had this land it was dedicated for a school then an extension to the Keilor Central Shopping Centre. Since the land was sold to Baptcare 17 years ago it was agreed upon selling this land to Baptcare and with the community and our Council in favour of a retirement village. **We have a much need for a retirement village in this area. Not to mention also, an age care and nursing home facility. No consideration has taken into account the history of Keilor Downs and it's community.**

We currently have 99 town houses being completed on Copernicus Way. Also within 400metres of this development we already have high density housing built. To introduce a further 47 Houses to such a small cluster, will create more problems within our community:

Traffic - Being only one entry or exit point, Thornhill Drive will become a main road. It's a quiet street which has a kindergarten and church all on the one side with residential on the other. The shopping centre has refused to have a road connecting to this development as they also can see the demographics and having the 47 houses here will incur an influx of traffic.

Parking - This development only has 1 parking per house hold. Overall there could be up to 150-170 people living in this development. Where are they going to park their cars....at the shopping centre or perhaps the side streets leading up to their homes. This will cause major issues for the current residents living close by.

Storm Water Drainage - - Due to the infrastructure in this area especially with our storm water system which currently struggles to keep up under a heavy down pour of rain. I have spoken with fellow residents and like them often our yards flood, and a further high density build will only increase more flooding. The capacity will be overloaded.

Keilor Central Shopping Centre - Already we have an influx of shoppers. Our major shops are struggling with the overload of shoppers. To be Covid safe under these conditions are and will be impossible. How are we as a committee to stay safe and social distance? Especially when we currently have 1400+ cases in our area.

Police - We currently struggle with the under man of our local police. On the eastern side the ratio is around 1 officer to 800 residents. We are currently sitting at 1 officer per 1800 residents and climbing. When calling for assistance we could be waiting up to 2-3 hours and at times, a no show. Where are our safety levels at?

Affordable/Commission Housing - We already have a high volume of housing in our area to which some are on 600metre blocks. Why isn't there money being put towards these houses, as so many are unoccupied and have been for a number of years now. They are run down and look disgraceful. With further high density housing being proposed it will only decrease our value to our homes. Look at rebuilding a couple of units on those existing 600metre blocks and this will allow the reduction of the high density housing looking at being built. Not to also mention, we have also just discovered we have roaming houses located in Keilor Downs as well. This was brought to our attention from local residents.

Its great the Victorian Government has issued Grants for Affordable Housing but it's sad to say building 47 houses in a small cluster will create major infrastructure problems in our area. This build needs to be done in an area with relevant spacing, including a park so that residents aren't on top of each other and with the right medical facilities close at hand. It's sad to say we have people sitting in front of the shopping complex begging for money. Realistically, how are these people going to afford rent. The last recorded statistics shows that in the St. Albans region there were 420 homeless people. Sunshine region a further 441. Keilor Downs recorded 32. Why aren't we targeting these larger areas to assist these people in need?

Upon approaching Bapcare in a meeting we mentioned about the agreement had with Brimbank Council regarding the selling of the land to build a retirement village. Their response was, "there isn't sufficient space for this kind of build." The land has not decreased in size and has been vacant for over 40 years. So in saying that, this only makes us to believe that the build has come to hand because of the Government's Grant...not to assist the community in need. If Bapcare claims they are wanting to do the right thing and help the vulnerable, from my point of view they need to look closely at where they build. **Consideration for those in need of mental health services, hospital, disability services, maternal child health facilities and most of all support in social services.** These people have venerable needs. Don't just place them in an area because the Government has given them a grant. They will be like sardines in a can, all crapped up in one area. A survey was conducted on an established existing high density housing and what was reported from this find that tenants didn't get the support they needed. They were left to deal with their own situation. Is this a fair proposition? We had questioned them also about a proposed age care/nursing home but Bapcare couldn't guarantee or give any light on this.

Upon further investigation we discovered that plans for 108 age care residence facility had been already approved. Which is great but this planning permit has now lapsed as it was granted on the 9th October 2020. So will they consider even more high density housing? No guarantee!

Focus on the real need and the fact that they have the grant in hand, for the developers to just build more housing wherever it suits them, is not right. Why has something like this even considered in such a small clustered area and bypassed Brimbank Council? As a rate payer our council needs to look hard and fast at this development. And to our disappointment after viewing the meeting with the Councillors (19th October 2021), to which I believe they have had no time in reviewing all the logistic to this development and couldn't answer some of the important questions put towards them, the majority agreed to this

proposal. Is it because this development is not in their backyard? We have a massive Aquatic and Wellness Centre being build right in front of this proposed development which will bring more people in the area and our community excepted this build. Keilor Downs is an area that holds elderly multicultural families. They have been here for most of their lives and what does that tell you.....they love the area. We have young families starting their lives here because they see the beauty in Keilor Downs, the open space and hope to spend a long time living here as well. Don't create a suburb in Keilor Downs with more high density housing ...we are overwhelmed and our infrastructure won't be able to handle continuous builds. We need to cater for the elderly. Our infrastructure it at full capacity now. Allowing 47 houses to be built in an area where normally 14 homes would be allocated....is a call for disaster.

We are a passionate community and I'm sure you are receiving a lot of objections for this build. A retirement village may not be profitable, but that is what is warranted in Keilor Downs. Along with an Age Care and Nursing Home facility.

I thank you for your time in reading my views and hope that you can review and consider the implications this will have on our suburb.

I would greatly appreciate a follow up email with your response.

A very concern resident,

Regards

57. Below is my feedback on the proposal

Car Parking:

The car parking provision for the development is inadequate. Although compliance is achieved with Clause 52.20 - Victoria's Big Housing Build, the reality is that one car parking space for each dwelling (particularly 3 bedroom dwellings) will lead to car parking issues within the subject site and broader neighbourhood.

It is appreciated that the proposed dwellings are likely to be occupied by people with low incomes, therefore, lowering the rate of car ownership. However, it is reasonable to assume that some larger households will own at least two vehicles by either adults or older children.

The issue is exacerbated by the fact that there are no visitor parking opportunities provided as part of the development. The proposed road widths are undersized to accommodate for safe on-street parking. It is reasonable to assume that residents will have friends or relatives visiting, but have nowhere to park their vehicles.

It will be inevitable that either as a result of inadequate dwelling parking provision and no visitor car parking, vehicles will be parked on nature strips or crossovers, creating pedestrian safety and visual amenity issues. Basically, cars will be parked in random locations and create an extremely unattractive environment and a safety issue when emergency services require a clear pathway.

Pedestrian Permeability:

The Keilor Downs Urban Design Framework requires pedestrian permeability/access to be provided through the site. Although pedestrian connectivity is clear to the south of the site, no clear access through the north of the site is shown on the plans.

The proposed development should be integrated with adjoining neighbourhoods (including the approved Aged Care Facility to the north) to allow for convenient pedestrian connectivity within the Keilor Downs Activity Centre.

Urban Design and Construction:

I support the construction of affordable housing provided it is well designed and constructed to a reasonable quality. Regularly these types of developments are designed and shown on plans in a way that would appear of a high standard, but ultimately get constructed to an inferior standard. Apart from the eyesore that is created, there is the bigger issue of negatively stigmatising the community which lives in what can be regarded as "cheap" housing.

It is suggested that a detailed materials and colours schedule, including internal fittings and fixtures, be considered as part of the planning assessment process. If the development is approved, the same materials and colours schedule should form part of any tender and construction process so there is clarity on final development outcomes.

58. My name is [redacted] and I am a father of 5 and live with my family in Keilor Downs.
I Object to the proposal 21A Copernicus Way Keilor Downs, as our council infrastructure is already at capacity and this new housing will just make a bad situation a lot worse!
I urge you to please VOTE NO to this proposal.

59. Dear Helen
I raise to you today a significant and exhaustive set of major concerns that the Keilor Downs community (read - Over 1000 petition signatures, both physical and electronic, noted in Annex A of the attachment) are providing to you regarding the development at 21 Copernicus Way, Keilor Downs. It is our expectation that each of the 1000+ respondents are included as a formal delivery of opposition to this development.
- The issues contained in my attached assessment document are exhaustive, ranging from the significant lack of community consultation to unacceptable and worrying non-compliances with extant planning regulations and Clause 52.20 as well as inconsistencies and inaccuracies throughout the publicly available planning documentation. On this basis alone the development is requested to be halted.
- Above all of this, is the deeply concerning lack of consideration for the local community, including the vulnerable and elderly, who make up a large percentage of the Keilor Downs residents. These people have been ignored, and it could be suggested that they were avoided, from clear communication on the development intentions discussed. Further to this, the COVID-19 restrictions, imposed by this State Government, appear to have been absent from the considerations during this process and the inability for the community to be made aware of this development remain aberrantly evident.
- Further concern with the proposed project is the basis of the homelessness data in which the location is recommended. We have found the data at the government's ABS repository (Ref 2.) shows that Keilor downs, and most of the surrounding suburbs, are resident to very low numbers of homelessness (under 32 records, this is inline with most surrounding suburbs such as Taylors Lakes, Taylors Hill, Keilor, Keilor East etc). This is not consistent with placing 'at risk' residents in a location which is suitable for enabling them to progress with their lives. It is contrary to the intent of social housing as this will place residents far from their current likely residence (such as Sunshine, Sunshine West with over 200 records of homelessness) and away from their known

community and essential services. This appears to be inconsistent with the approach detailed within the planning documentation and the overall intent of new Social Housing.

The information found is contrary to the local Council of Brimbank Meeting (19 October 2021) in which the Council stated, on multiple occasions, that "this area is subject to some of the highest rates of homelessness in Victoria". Not only does this show a poorly prepared Council, but an uneducated Council which is out of touch with its community. Further to my concern is the significant lack of review and knowledge of our local council members, specifically Mayor Rasic lack of leadership and Deputy Mayor Nguyen's incorrect statements. The Deputy Mayor and multiple Councillors showed a significant lack of understanding of the proposed build where questions were posed to the forum which included but was not limited to:

- Whether the proposal was for 'Social housing' or 'Affordable Housing';
- How many dwellings were proposed;
- The proposed number of levels which were to be built;
- The location of the build;
- The proposed changes to the surrounding land which retains approvals for further developments; and
- Which housing company was providing the planning documentation and executing the project.

Due to the above reasons, I have significant doubt that the minutes released at Ref 1. were completed with accuracy and due process given the unconscionable lack of understanding presented by this local Council.

Note that over 1000 responses have been received to object to this development which, due to COVID-19 restrictions, excludes many of the vulnerable and elderly as simple door knocking services are effectively unable to be conducted by this community to support their needs as this development and State Government appears to have forgotten that their opinion matters.

For these reasons, and the detailed information attached, I request your support to re-consider the development and its purpose in Keilor Downs. These decisions must be made with the appropriate level of Community engagement, rather than a ham-fisted approach to a solution which is inconsistent with the Keilor Downs regular and well established planning requirements which are able to be avoided due to the poorly written Clause 52.20.

Regards,

[name redacted] and 1000+ residents of Keilor Downs, Melbourne 3038
Contactable via this email address or [phone number redacted]

60. Surely the old Nestlé factory in St Albans would be a better spot.

Trains, shop varieties.

61. Good evening Natalie and Ranka

My name is [redacted], I have been living in Keilor Downs with my wife and two young children for 6 years and have been a resident of Brimbank for over 25 years. I am writing to you to express my opposition to the Baptistcare housing development which is being proposed on the land between Copernicus Way and Thornhill Drive. Adjacent to what us locals simply know as Keilor Downs Plaza.

There are many concerns with the proposal that I know many of my fellow community members share. I'd like to bring this to your attention and I trust you're willing to assist Brimbank and Keilor Downs residents with sharing our concerns to the State Government, in particular the Minister for Planning, Minister for Housing and Minister for Child Protection, Mr Richard Wynne.

To begin, yesterday morning, a fellow Keilor Downs resident shared a link to a Facebook post which outlined the proposal. It was quickly shared amongst the local community. For many, like myself, this was the first time hearing or reading about it. As part of learning this, we also learnt that there was a community information session being held on the same day (last night) hosted by Baptistcare and Urbis (their town planning partner). As you would understand, many of those who reside in Keilor Downs are elderly, have English as a second language, or would simply not regularly be on the internet. Many would certainly not have this information at hand.

Approximately 40 local residents joined the Zoom call last night to raise their concerns. The opposition to the proposal was unanimous, all local residents in agreement with each other. I will not speak on behalf of the community, however I am tabling my concerns in which I know many share.

- With other new housing builds in progress, this will absolutely add to traffic congestion. Baptistcare suggested this has been modelled, but without those completed builds, how can we be certain this won't impact the community?
- Parking - where will the proposed new residents park? With 47 new dwellings and at least 130+ new residents, will Thornhill Drive turn into a car park? Will the shopping centre car park continually be full? Will there be a sea of cars parked on the vacant land?
- There are major concerns around the consultation process, which seems to have many flaws. Firstly, the small permit signage has been hidden away in an area which isn't often frequented by foot and inaccessible by car. There has been zero consultation with local residents up until this point. Baptistcare indicated on last night's call that Brimbank Council has been aware of this development since the beginning of the year. I'd like clarification on that.
- It was also mentioned by Baptistcare that a flyer drop had been conducted, targeted at residents who live within 150m of the site. This would cover barely any houses, if at all, as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other is residents in Thornhill Drive, Milas Ct and Packard Street. Some of which have not received any communication, others which noted a letter in the mail from the council a week ago. This in particular has angered residents.
- In addition to this, for many of our residents in Keilor Downs, English is their second language. Poor communication combined with inadequate time, particularly for these residents, has affected the chance to review and respond to the proposal.
- Baptistcare outlined that they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, where the overwhelming majority indicated Keilor Downs as their preference. We understand that Baptistcare have owned the large parcel of land between Copernicus Way and Thornhill Drive for the past 7-8 years. We request Brimbank Councils assistance in obtaining the survey results, to ensure Baptistcare owning a large parcel of land in Keilor Downs, where their survey respondents preferred Keilor Downs, is only a coincidence and not corrupt, whereby the recent Victorian Government announcement of the \$150m housing grant has changed the decision from a retirement village to an affordable housing development. Retirement villages and aged care facilities in our suburb are - and always will be welcome.

- We also understand that there are many vacant commission houses in the area already which further highlights the fact that this development is not needed.
- There are concerns around infrastructure, both current and what would be the future. How can we be comfortable that infrastructure requirements will be met?
- Policing and police resourcing is also of concern. In the West, we have 1 police officer for every 1600 residents. In the east, there is 1 police officer for every 800 residents. In our area of Keilor Downs, this will put further strain on resources, with the continued population growth.
- In relation to the above, safety for our community and our residents is of utmost importance. The proposal to build this housing development in between two early learning centres and next to a shopping centre, where residents frequent at night, is concerning.
- Mental health support for our local residents is required now, more than ever. Mental health issues within our community continue to not be addressed. An increase in vulnerable residents will put further pressure on our mental health system.
- Our childcare and kindergarten centres are and will continue to be overloaded. We have a shortage of carers in the area, this will make the shortage worse.

I hope you hear my concerns, these are just a few. I'm asking you as leaders in our community to support our objection and help us take objections to the state government, who ultimately will decide to accept or reject the proposal. We elect you because we trust you will do what's best for the community.

Residents of Keilor Downs are proud to live here. Many have built houses and have never sold. We want to ensure our suburb can prosper, that the character of our suburb does not change and that residents can live safely, in harmony.

There is a petition which was created yesterday, which already has almost 200 signatures. As we get the word out to the community, this will grow substantially. This petition will be going to Mr Richard Wynne.

<https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilor-downs>

Thank you for taking the time to read through this and I look forward to hearing from you soon.

Regards

62.

Thank you for your time and patience during the Zoom call on 12th October. I wanted to share with you in writing my concern over the proposed social housing development planned for 21A Copernicus Way in Keilor Downs.

I have a property on Copernicus Way and my parents also live at 26 Copernicus Way. Neither of us received any communication about this development and learned of it via Facebook and a friend that lives at 22 Copernicus Way. The lack of communication to the residents of Keilor Downs in the lead up to the Zoom call was disappointing.

There were some interesting speakers on the Zoom call and emotions aside, some valid points were raised.

1. Social Housing

We have existing commission housing scattered throughout Keilor Downs that, apparently from the callers, have been empty and not well maintained for extended periods of time so why do we need more social housing in the area? Also, why do we need to have social housing so densely populated in one area? This is the part that I am strongly opposed too. It's right next to the shopping centre, a Kindergarden and the newly constructed St Albans Leisure Centre. These are typically places that our children and my elderly parents will frequent on a regular basis and I am concerned about the calibre of residents that will be living in the social housing in such close proximity to these venues. How can we be assured that these residents do not have a criminal background/currently involved in crime, be influenced by drugs, are not unruly and abusive? These are stereotypical traits of residents of commission housing and you mentioned on the call that you will be selecting the residents from the list of people currently on the same list of people for waiting commission housing. This concerns me greatly for the safety of my family and the existing residents of Keilor Downs.

2. Culture

As I mentioned on the call, I chose to live in this area because my family live there and I love the culture. If I wanted to live in an area that was known for social/commission housing I would have chosen to live in one of those areas but I chose not to. My wife and I made a conscious choice about where we wanted to live and raise our family. We chose the area because there were many like minded families around us and wanted our children to attend school with their children to minimise any chance of them mixing with the wrong crowd. Our children are now in secondary school and so far the decision to live in Keilor Downs has turned out great for us. We want that for future generations of Keilor Downs residents too, which may include our grandchildren one day.

3. Congested Traffic

I am also concerned about traffic in the area. Morning peak hour traffic on Taylors Rd leading to the Green Gully road on ramp of the Calder Freeway in (pre-Covid restrictions) was horrendous. The Sunshine Avenue traffic leading to the Taylors Lakes on ramp was no better. Conversely, peak hour traffic in the evenings was equally horrendous. We already have to deal with two new runways being developed at Tullamarine airport that are going to add significant strain to our peak hour commutes without adding almost 50 new properties to the area that will add more congestion. Has anybody factored this into the impacts of this social housing development? The current infrastructure isn't coping so more housing has the potential to cripple it.

4. Strained Services

We already have long wait times at our existing medical facilities in the area and the queues to buy groceries at Keilor Downs Shopping Centre are long at the best of times. Adding 47 properties to the area is only going to exacerbate the existing problems we are facing. What is being proposed to offset the demand the additional 47 properties will create on these services?

Keilor Downs is currently a great place to live and has a mix of elderly and young families from multiple backgrounds. We do not want this development to change the culture of our neighbourhood, nor increase crime.

Of course I have a heart and am considerate of the plight of the individuals in need of social housing but I don't believe that the Social Housing Density proposed for Keilor Downs is appropriate for the area or considerate of the existing residents who have lived and grown up in the area for 30+ years.

I have included Ms Natalie Suleyman (MP) and Cr Virginia Tachos in this email so they are aware of what I have communicated to you as a concerned resident and can raise these concerns on behalf of all Keilor Downs residents with their respective offices.

| | |
|-----|--|
| 63. | <p>Hi Natalie,</p> <p>I hope you and the family are well and keeping safe. I am[names redacted] We crossed paths a few times and I've always been a very staunch supporter of you, your brother and your father. We even had placards in our front yard to support your election bid, also help with handing out brochures on Election Day. My family and I have always been staunch supporters of yours despite all the negatives that get thrown around, and there have been many. Sadly this support is starting to wane as a result of the proposed social housing build at the top end of Copernicus Way which is the area I live in. I am a member of the resident against high density living and will pursue all avenues possible to put a halt to it or get the numbers built, dramatically reduced.</p> <p>I do not think this project has been thoroughly thought through. There has certainly been no consideration for the residents who live around that area. I also deplore the tactics used by Bapcare to avoid scrutiny. I urge you to reconsider the support for this build and consider your supporters in the area. I have spoken to a few families who are in a similar situation to me and have also supported you through out your career. They also feel betrayed by the state labor party. Please don't forget we are the ones that have stuck with you through thick and thin. The ones that help you get where you are now. Don't betray this trust and support, please consider our point of view. Please consider and ensure our own going support.</p> |
| 64. | <p>Dear ministers,</p> <p>Keilor Downs residents are objecting to the 47 dwellings proposed to be built by Bapcare adjacent to Keilor Central Plaza, due to insufficient transparency related to:</p> <ol style="list-style-type: none"> 1. Traffic generation and parking - with 47 units and 150+ residents estimated for this new tiny pocket, parking will present a challenge, especially when having visitors. 2. Infrastructure uplift will be required – whom will be responsible and accountable? 3. Resource uplift – Police resourcing has never been a priority by the local or state government for 3038 – even with continued residential growth. Western Councils have 1 Police Officer for every 1600 residents compared to Eastern Councils who have 1 Police Officer for every 800 residents. 4. Mental Health Support for our existing residents is below average, especially during these unprecedented times. We are witnessing a high rates of mental health issues in our community and these are not being addressed nor supported by our Local and State Government. An increase to vulnerable residents is only going to place more pressure on the Mental Health System. We request transparency around accountability and responsibility to address these concerns and a formalised plan, prior to high density planning being considered. 5. Bapcare stated a survey or studies have concluded this is a requirement in our neighbourhood – we request the opportunity to review these surveys and the foundations of which have concluded this statement? |

6. A change to the atmosphere and amenity of our area (for the worse) and impact on the character of the neighbourhood is in question.
7. Similar recent developments of this type - low rise/ high density with lower socio-economic demographics have led to a significant uplift in shoplifting, petty crime, begging, aggressive and disruptive behaviour, and drug and alcohol abuse which has a detrimental effect especially when located adjacent to shopping centres. Have any surveys into this type of behaviour or problems been carried out by the developer or planners? If so, we request to review the results.
8. Waste Management and Essential Services have not been considered.
9. Safety for our community is a concern.
10. For many residents in 3038, English is their second language – this means poor communication and notices have hindered our opportunity to review proposals.
11. The site was originally proposed to be an aged care facility when sold in 2016, but the \$150 Million Housing Grant announced by the State Government has obviously changed their proposal to Affordable Housing.
12. Our LOCAL COUNCIL have not been consulted on the matter
13. The proposed development is immediately adjacent to a child care facility, within approx. 400 metres of the local playgroup facility, leisure centre and skate park.
14. We currently have significant constraints with childcare and kindergarten facilities. this will load the burden. We also have a shortage of carers in our area and this development will just create an overload
15. Permit Signage has been placed in less than obvious locations, thereby reducing the opportunity for residents to have knowledge of this proposal, and to lodge objections or otherwise. Apparently, the developer was only required to advise residents within 150 metres of the site, severely limiting the wider community's knowledge of the proposal.

65. Dear all,

I raise to you today a significant and exhaustive set of major concerns that the Keilor Downs community (read - Over 1000 petition signatures, both physical and electronic, noted in Annex A of the attachment) are providing to you regarding the development at 21 Copernicus Way, Keilor Downs. It is our expectation that each of the 1000+ respondents are included as a formal delivery of opposition to this development.

The issues contained in my attached assessment document are exhaustive, ranging from the significant lack of community consultation to unacceptable and worrying non-compliances with extant planning regulations and Clause 52.20 as well as inconsistencies and inaccuracies throughout the publicly available planning documentation. On this basis alone the development is requested to be halted.

Above all of this, is the deeply concerning lack of consideration for the local community, including the vulnerable and elderly with many having English as their second language who make up a large percentage of the Keilor Downs residents. These people have been ignored, and it could be suggested that they were avoided, from clear communication on the development intentions discussed. Further to this, the COVID-19 restrictions, imposed by this State Government, appear to have been absent from the considerations during this process and the inability for the community to be made aware of this development remain aberrantly evident.

Further concern with the proposed project is the basis of the homelessness data in which the location is recommended. We have found the data at the government's ABS repository (Ref 2.) shows that Keilor Downs, and most of the surrounding suburbs, are resident to very low numbers of homelessness (under 32 records, this is in line with most surrounding suburbs such as Taylors Lakes, Taylors Hill, Keilor, Keilor East etc). This is not consistent with placing 'at risk' residents in a location which is suitable for enabling them to progress with their lives. It is contrary to the intent of social housing as this will place residents far from their current likely residence (such as Sunshine, Sunshine West with over 200 records of homelessness) and away from their known community and essential services. This appears to be inconsistent with the approach detailed within the planning documentation and the overall intent of new Social Housing.

The information found is contrary to the local Council of Brimbank Meeting (19 October 2021) in which the Council stated, on multiple occasions, that "this area is subject to some of the highest rates of homelessness in Victoria". Not only does this show a poorly prepared Council, but an uneducated Council which is out of touch with its community. Further to my concern is the significant lack of review and knowledge of our local council members, specifically Mayor Rasic's lack of leadership and Deputy Mayor Nguyen's incorrect statements. The Deputy Mayor and multiple Councillors showed a significant lack of understanding of the proposed build where questions were posed to the forum which included but was not limited to:

- Whether the proposal was for 'Social housing' or 'Affordable Housing';
- How many dwellings were proposed;
- The proposed number of levels which were to be built;
- The location of the build;
- The proposed changes to the surrounding land which retains approvals for further developments; and
- Which housing company was providing the planning documentation and executing the project.

Due to the above reasons, I have significant doubt that the minutes released at Ref 1. were completed with accuracy and due process given the unconscionable lack of understanding presented by this local Council.

Note that over 1000 responses have been received to object to this development which, due to COVID-19 restrictions, excludes many of the vulnerable and elderly as simple door knocking services are effectively unable to be conducted by this community to support their needs as this development and State Government appears to have forgotten that their opinion matters.

For these reasons, and the detailed information attached, I request your support to re-consider the development and its purpose in Keilor Downs. These decisions must be made with the appropriate level of Community engagement, rather than a ham-fisted approach to a solution which is inconsistent with the Keilor Downs regular and well established planning requirements which are able to be avoided due to the poorly written Clause 52.20.

Regards,

[names redacted] and 1000+ residents of Keilor Downs, Melbourne 3038

References:

1. Brimbank Council Meeting Minutes (19 October 2021)

<https://www.brimbank.vic.gov.au/council/council-meetings/2021-council-meeting-agendas-and-minutes>

<https://www.youtube.com/playlist?list=PLEw1sHlvzDqGbWOKNATAvxzD29bhvIDIB> (note: Recording is yet to be uploaded)

2. ABS Census of population and housing estimating homelessness

<https://www.abs.gov.au/statistics/people/housing/census-population-and-housing-estimating-homelessness/2016>

66. **Re: Baptistcare development of 21A Copernicus Way, Keilor Downs**

We (read: the respondents identified at Annex A of this document) are writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Baptistcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. We live in Keilor Downs, many with young families and many who have been residents of Brimbank for over 20 years. Of this community there are those in various areas of employment, including professionals in the Health and Community Services sector with extensive experience and support the awareness of the needs of communities that the project would target.

There are several key planning issues with the proposal we request consideration of and accordingly an appropriate response to. additionally supported by an exhaustive list on non-compliant and poorly considered planning solutions identified at Annex B of this document.

Lack of Community Consultation and Culturally inclusive practice.

We were informed about this proposal recently from our neighbours who live within 150 metres of the proposed construction, or via viewing of the obscurely located planning advice sign. Subsequently, a community consultation meeting about the proposal was conducted by Baptistcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project (estimated at no more than 15 residents), as one side is the plaza, another is the new aquatic centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area which isn't often frequented by foot and is not accessible by car, and is additionally over 150m from the construction location. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents and is also non-compliant to Clause 52.20 of which this development's proposal is based upon.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English, and additionally, no alternative language service is available to understand the planning information. Some residents were able to attend the recent consultation meeting with Bapcare via Zoom, however measures were not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project whom are not familiar with technology services. It was evident from the meeting that this demographic was not present, and their voice continues to not have been heard.

In addition to this, there has been no consideration of the COVID-19 restrictions that are placed on the communities in Melbourne and the subsequent difficulty in access to information relating to this development; being that the only publicly available information is the obscurely positioned sign. This is further evidenced by the community itself forming this document, of it's own volition, with almost all residents being made aware via word of mouth.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above. To date, this information remains unavailable, unclear and unverified of fact.

We understand that Baptcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Baptcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Baptcare have changed their plan of building a retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected. This is further supported by the significant lack of community consultation.

Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Baptcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

2. Given the type of dwellings and number, this will no doubt have a significant impact on the house values within a far greater radius than 150m. Initial assessments would indicate the impact to be to no less than 3km surrounding the development. This has not been addressed in the reports and consideration has not been provided to this effect.
 - a. **This is inappropriate and must be addressed for the impacted community.**
3. The general Social Housing policy of 'One in Nine' is a method of disbursing social housing tenants throughout the community. This is in recognition of best practice australia wide, being that people experiencing disadvantage are far more likely to move along the housing continuum and out of disadvantage when they are part of a socially diverse community: rather than collate the disadvantaged community together in a complex that, over time, will only erode and decay into another block of social housing 'flats' like those already existing around areas of Melbourne. Additionally, the City's own policy, requires any development not subject future occupants to undesirable levels of disturbance and/or nuisance.
4. In addition to para 3. This development will house disadvantaged individuals in a single location further putting pressure on community well being.
 - a. **This is non-compliant** with Clause 21.03-1.
5. Given the impact of social housing on local emergency services, and the significant number of new dwellings being built, there has been no review or consideration on the demand for local emergency services.
 - a. This is a significant oversight.
6. The location of the development is in a Commercial Zone 1.
 - a. **This is non-compliant** inconsistent with the normal General Residential or Residential Growth Zone requirements to produce high density dwellings (ref Clause 21.02)

Town Planning Report Concerns:

1. The development of 47 dwellings and estimated 150 inhabitants is likely to result in no less than approximately 60 cars (based on unit distributions). A single car park appears to be poorly assessed, despite it passing Clause 52.20 basic requirements.
2. The planning report notes that this project is developed adjacent to a proposed aged care facility (future). This appears to be inconsistent and provides no assessment of the future transport requirements for the land parcel.
3. Clause 15.01-2S: Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.
 - a. **Non-compliant.** Property values will be significantly impacted. The proposed dwellings are inconsistent with all properties in the local area (proposed are high density - existing are not high density). incomplete consideration of parking requirements (only 47 spaces provided, well below assessed inhabitant requirements).
4. Clause 15.01-5S: Pattern of local urban structure and subdivision. Heritage values and built form that reflect community identity.
 - a. **Non-compliant.** There has been no consideration of the local housing representation which have existed for over 50 years. The new development is inconsistent in size/look/feel of the entire suburb.

5. Clause 21.02-3: Apply the Commercial 1 Zone to facilitate retail uses and mixed use development consistent with the primary purpose of the zone.
 - a. **Non-compliant.** This development is only residential in purpose. There is zero foreseeable consideration for this clause in the development. It has not been addressed.
6. Clause 21.04: Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.
 - a. **Non-compliant.** The significance of moving from large parcel property of single dwellings immediately to high density dwellings is inconsistent.
7. Section 6.1: These statements are inconsistent with the requirements of Commercial Zone 1 and do not appear to be logical. Further detail and a re-write of the presented statements is essential.
 - a. **Non-Compliant.** There is no logic to the proposed project achieving any of the requirements of this Commercial Zone 1 requirements.
8. Section 6.3: Incorrectly states that this site is not subject to the Special Building Overlay.
 - a. **Non-Compliant.** All Land data states clearly that this site is subject to DCPO - Development Contributions Plan Overlay - Schedule 2, DPO - Development Plan Overlay - Schedule 2, **SBO - Special Building Overlay.** Significant oversight on the planning report.
9. Section 6.5: Car parking assessment has been poorly conducted as previously stated throughout this correspondence.
10. Section 7.1: Brimbank Planning Policy Framework assessments: There is no assessment of the Keilor Downs Urban Design Framework document.
 - a. **This appears to be a significant oversight.**
11. Section 7.2: Land use. The statements here are inconsistent with the Commercial Zone 1 framework as previously explained in General Concerns 6. The large scale of proposed density may be appropriate for the proximity to the shopping area, but it is not consistent with a smooth transition between the low density dwellings immediately adjacent to the area.
 - a. **This appears to be a significant oversight.**
12. Section 7.8: As previously stated throughout this Correspondence, the stated allocation of parking is inconsistent and appears to be poorly calculated. This will undoubtedly result in additional parking outflows into the general residential area.
13. General: Of the Town Planning Report, there is a significant non-compliance that has been observed. From Clause 52.20-04: Consultation requirements Before the use or development commences: Public consultation, and consultation with the relevant municipal council, must be undertaken. A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to must be prepared to the satisfaction of the responsible authority
 - a. **Non-Compliant.** Public information sharing appears to have been poorly conducted, with sharing of relevant data and planning information to the community of keilor downs being assessed as significantly inappropriate. There has been little effort to share information with only a 150m radius of residential sites being advised of such a large build with implications to the wider community being ignored. The majority of the community has only been able to find the relevant information via the physical standing advice board at the site. Noting the impacts of COVID-19 and the

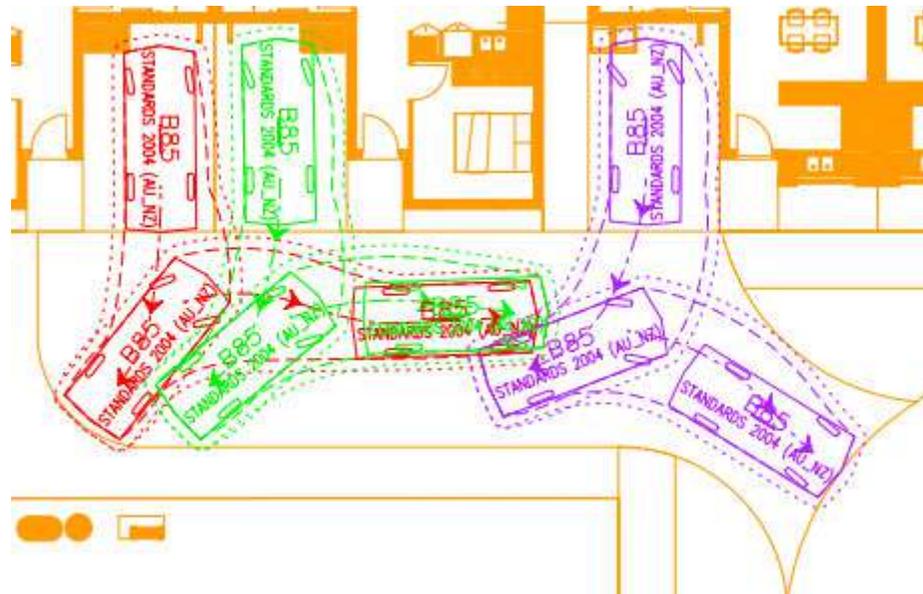
relevant restrictions, this can only be reviewed as poorly considered and completely void of community impact assessment.

Transport Impact Assessment Concerns:

Parking assessments and driving assessments from the annexes of the document (by Onemilegrid). These parking diagrams show a barely achievable parking assessment, additionally is of note the 'impact' to the internal garage space with each vehicle diagram showing that the standard vehicle diagrams cannot fit within the garage. This is not consistent or appropriate with a reasonable assessment of parking conditions. Entry has not been considered. The presented turning radii do not appear to be achievable (specifically the 'red' vehicle in the diagram at Figure 1)

- a. **This is inappropriate and inconsiderate, additionally it can be considered unsafe.**

Figure 1 - Extract from Baptcare Public Reports



Conclusion:

In accordance with the exhaustive list of non-compliant, inappropriate and inconsistent statements in the provided reports, supported by the list of general concerns and poor circulation of information relating to the project providing clear non-compliance to sections required to get to this stage of planning as follows:

1. 52.20-1
2. 52.20-3
3. 52.20-4
4. 52.20-6.4

We request cancellation of this proposal and that reconsideration of the future planning in the area is conducted in a manner which is commensurate to and supportive of the local community needs. All reconsideration must be achieved through community input and via the required council planning solutions established in the Brimbank area.

67. Hi Phil,

In addition to the online petition, can you attach the below manual signatures to our objection letters. It can be apart of Appendix A.

These residents don't have access to technology.

68. Dear all,

I raise to you today a significant and exhaustive set of major concerns that the Keilor Downs community (read - Over 1000 petition signatures, both physical and electronic, noted in Annex A of the attachment) are providing to you regarding the development at 21 Copernicus Way, Keilor Downs. It is our expectation that each of the 1000+ respondents are included as a formal delivery of opposition to this development.

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- How many dwellings were proposed;
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- The proposed changes to the surrounding land which retains approvals for further developments; and
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Due to the above reasons, I have significant doubt that the minutes released at Ref 1. were completed with accuracy and due process given the unconscionable lack of understanding presented by this local Council.

Note that over 1000 responses have been received to object to this development which, due to COVID-19 restrictions, excludes many of the vulnerable and elderly as simple door knocking services are effectively unable to be conducted by this community to support their needs as this development and State Government appears to have forgotten that their opinion matters.

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Regards,

[names redacted] and 1000+ residents of Keilor Downs, Melbourne 3038
Contactable via this email address

References:

1. Brimbank Council Meeting Minutes (19 October 2021)

<https://www.brimbank.vic.gov.au/council/council-meetings/2021-council-meeting-agendas-and-minutes>

<https://www.youtube.com/playlist?list=PLEw1sHlvzDqGbW0KNATAvxzD29bhvIDIB> (note: Recording is yet to be uploaded)

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CONSULTATION FEEDBACK FORM
BAPTCARE AFFORDABLE HOUSING PROPOSAL
NO. 21A COPERNICUS WAY, KEILOR DOWNS

Important Note: your submission will be included within a feedback report which is required by Council Victoria to be made publicly available following a decision on the proposal.

Name:

Address:

Postal Address:

Email Address:

Telephone Number:

Please provide your feedback on the proposal:

I FEEL THAT AS THE PROPOSED WE HAVE IS AN INVESTMENT PROPOSAL, THE DEVELOPMENT OF THE BAPTCARE AFFORDABLE HOUSING WILL REDUCE THE FINANCIAL GROWTH POTENTIAL OF THE SURROUNDING AREAS
 WE ARE WORKING FOR THE MAXIMUM GROWTH POTENTIAL FOR THE AREA, AS THIS PROPOSAL IS PART OF THE RETIREMENT STRATEGY.

How will you be affected by the proposal:

THE FINANCIAL GROWTH POTENTIAL OF THE SURROUNDING AREAS WILL BE AFFECTED BY THE DEVELOPMENT.

Signature:

Date:

24/10/21

Similar recent developments of this type - low rise/ high density with lower socio-economic demographics have led to a significant uplift in shoplifting, petty crime, begging, aggressive and disruptive behaviour, and drug and alcohol abuse which has a detrimental effect especially when located adjacent to shopping centres. Have any surveys into this type of behaviour or problems been carried out by the developer or planners? If so, we request to review the results.
Our property value will drop.

71. **Re: Baptistcare development of 21A Copernicus Way, Keilor Downs**

We (read: the respondents identified at Annex A of this document) are writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Baptistcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. We live in Keilor Downs, many with young families and many who have been residents of Brimbank for over 20 years. Of this community there are those in various areas of employment, including professionals in the Health and Community Services sector with extensive experience and support the awareness of the needs of communities that the project would target.

There are several key planning issues with the proposal we request consideration of and accordingly an appropriate response to. Additionally supported by an exhaustive list on non-compliant and poorly considered planning solutions identified at Annex B of this document.

Lack of Community Consultation and Culturally inclusive practice.

We were informed about this proposal recently from our neighbours who live within 150 metres of the proposed construction, or via viewing of the obscurely located planning advice sign. Subsequently, a community consultation meeting about the proposal was conducted by Baptistcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project (estimated at no more than 15 residents), as one side is the plaza, another is the new aquatic centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area which isn't often frequented by foot and is not accessible by car, and is additionally over 150m from the construction location. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents and is also non-compliant to Clause 52.20 of which this development's proposal is based upon.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English, and additionally, no alternative language service is

available to understand the planning information. Some residents were able to attend the recent consultation meeting with Baptcare via Zoom, however measures were not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project whom are not familiar with technology services. It was evident from the meeting that this demographic was not present, and their voice continues to not have been heard.

In addition to this, there has been no consideration of the COVID-19 restrictions that are placed on the communities in Melbourne and the subsequent difficulty in access to information relating to this development; being that the only publicly available information is the obscurely positioned sign. This is further evidenced by the community itself forming this document, of it's own volition, with almost all residents being made aware via word of mouth.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most

residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above. To date, this information remains unavailable, unclear and unverified of fact.

We understand that Baptistcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Baptistcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Baptistcare have changed their plan of building a retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected. This is further supported by the significant lack of community consultation.

Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Baptistcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

We direct you to Annex A and Annex B of this document for the persons who oppose this development and further evidence of the non-compliance to Clause 52.20.

Annex A - Individuals who oppose this development

Please find at the following link over 1300 local residents who are opposed to this development. Each of these individuals is to be considered as a formal respondent to this objection and as such included in Baptcare's formal review paper than is supplied to the State Government or its Representatives in accordance with Clause 52.20 (Department of Health and Human Services or the Director of Housing)

Current petition for rejection: https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilor-downs?fbclid=IwAR10U3M1B4S21a_Z1SfZUc2q1zQYOYb1U3GuFPIfU0g0-Zw3V0P-Zmswiw

Annex B - Technical Assessment of Baptcare's Planning Reports

This assessment is generated from the following publically available reports:

<https://www.baptcare.org.au/services/housing/affordable-housing>

General Concerns:

1. This development is for 47 dwelling of unknown inhabitant numbers, however, it can be assumed that approximately 150 people will occupy this area. Given the significant numbers of inhabitants and dwellings being built, it is inappropriate that the distribution of advice relating to this build was only provided to a 150m radius of the build location. [REDACTED]
[REDACTED] There will be significant impact to the surrounding area, including schools, public facilities (parks etc), community facilities (gyms/pools), retail and shopping facilities, of which the Keilor Downs community regularly utilise. The majority of the user community will remain unaware of this development. [REDACTED]
[REDACTED]
 - a. This is inappropriate and requested to be addressed.
2. Given the type of dwellings and number, this will no doubt have a significant impact on the house values within a far greater radius than 150m. Initial assessments would indicate the impact to be to no less than 3km surrounding the development. This has not been addressed in the reports and consideration has not been provided to this effect.
 - a. This is inappropriate and must be addressed for the impacted community.

3. The general Social Housing policy of 'One in Nine' is a method of disbursing social housing tenants throughout the community. This is in recognition of best practice australia wide, being that people experiencing disadvantage are far more likely to move along the housing continuum and out of disadvantage when they are part of a socially diverse community; rather than collate the disadvantaged community together in a complex that, over time, will only erode and decay into another block of social housing 'flats' like those already existing around areas of Melbourne. Additionally, the City's own policy, requires any development not subject future occupants to undesirable levels of disturbance and/or nuisance.
4. In addition to para 3. This development will house disadvantaged individuals in a single location further putting pressure on community well being.
 - a. **This is non-compliant** with Clause 21.03-1.
5. Given the impact of social housing on local emergency services, and the significant number of new dwellings being built, there has been no review or consideration on the demand for local emergency services.
 - a. This is a significant oversight.
6. The location of the development is in a Commercial Zone 1.
 - a. **This is non-compliant** inconsistent with the normal General Residential or Residential Growth Zone requirements to produce high density dwellings (ref Clause 21.02)

Town Planning Report Concerns:

1. The development of 47 dwellings and estimated 150 inhabitants is likely to result in no less than approximately 60 cars (based on unit distributions). A single car park appears to be poorly assessed, despite it passing Clause 52.20 basic requirements.
2. The planning report notes that this project is developed adjacent to a proposed aged care facility (future). This appears to be inconsistent and provides no assessment of the future transport requirements for the land parcel.
3. Clause 15.01-2S: Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.
 - a. **Non-compliant.** Property values will be significantly impacted. The proposed dwellings are inconsistent with all properties in the local area (proposed are high density - existing are not high density), incomplete consideration of parking requirements (only 47 spaces provided, well below assessed inhabitant requirements).
4. Clause 15.01-5S: Pattern of local urban structure and subdivision. Heritage values and built form that reflect community identity.
 - a. **Non-compliant.** There has been no consideration of the local housing representation which have existed for over 50 years. The new development is inconsistent in size/look/feel of the entire suburb.
5. Clause 21.02-3: Apply the Commercial 1 Zone to facilitate retail uses and mixed use development consistent with the primary purpose of the zone.
 - a. **Non-compliant.** This development is only residential in purpose. There is zero foreseeable consideration for this clause in the development. It has not been addressed.

6. Clause 21.04: Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.
 - a. **Non-compliant.** The significance of moving from large parcel property of single dwellings immediately to high density dwellings is inconsistent.
7. Section 6.1: These statements are inconsistent with the requirements of Commercial Zone 1 and do not appear to be logical. Further detail and a re-write of the presented statements is essential.
 - a. **Non-Compliant.** There is no logic to the proposed project achieving any of the requirements of this Commercial Zone 1 requirements.
8. Section 6.3: Incorrectly states that this site is not subject to the Special Building Overlay.
 - a. **Non-Compliant.** All Land data states clearly that this site is subject to DCPO - Development Contributions Plan Overlay - Schedule 2, DPO - Development Plan Overlay - Schedule 2, **SBO - Special Building Overlay**. Significant oversight on the planning report.
9. Section 6.5: Car parking assessment has been poorly conducted as previously stated throughout this correspondence.
10. Section 7.1: Brimbank Planning Policy Framework assessments: There is no assessment of the Keilor Downs Urban Design Framework document.
 - a. **This appears to be a significant oversight.**
11. Section 7.2: Land use. The statements here are inconsistent with the Commercial Zone 1 framework as previously explained in General Concerns 6. The large scale of proposed density may be appropriate for the proximity to the shopping area, but it is not consistent with a smooth transition between the low density dwellings immediately adjacent to the area.
 - a. **This appears to be a significant oversight.**
12. Section 7.8: As previously stated throughout this Correspondence, the stated allocation of parking is inconsistent and appears to be poorly calculated. This will undoubtedly result in additional parking outflows into the general residential area.
13. General: Of the Town Planning Report, there is a significant non-compliance that has been observed. From Clause 52.20-04: Consultation requirements Before the use or development commences: Public consultation, and consultation with the relevant municipal council, must be undertaken. A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to must be prepared to the satisfaction of the responsible authority
 - a. **Non-Compliant.** Public information sharing appears to have been poorly conducted, with sharing of relevant data and planning information to the community of keilor downs being assessed as significantly inappropriate. There has been little effort to share information with only a 150m radius of residential sites being advised of such a large build with implications to the wider community being ignored. The majority of the community has only been able to find the relevant information via the physical standing advice board at the site. Noting the impacts of COVID-19 and the relevant restrictions, this can only be reviewed as poorly considered and completely void of community impact assessment.

Transport Impact Assessment Concerns:

Parking assessments and driving assessments from the annexes of the document (by Onemilegrid). These parking diagrams show a barely achievable parking assessment, additionally is of note the 'impact' to the internal garage space with each vehicle diagram showing that the standard vehicle diagrams cannot fit within the garage. This is not consistent or appropriate with a reasonable assessment of parking conditions. Entry has not been considered. The presented turning radii do not appear to be achievable (specifically the 'red' vehicle in the diagram at Figure 1)

- a. **This is inappropriate and inconsiderate, additionally it can be considered unsafe.**

Figure 1 - Extract from Baptcare Public Reports

Conclusion:

In accordance with the exhaustive list of non-compliant, inappropriate and inconsistent statements in the provided reports, supported by the list of general concerns and poor circulation of information relating to the project providing clear non-compliance to sections required to get to this stage of planning as follows:

1. 52.20-1
2. 52.20-3
3. 52.20-4
4. 52.20-6.4

We request cancellation of this proposal and that reconsideration of the future planning in the area is conducted in a manner which is commensurate to and supportive of the local community needs. All reconsideration must be achieved through community input and via the required council planning solutions established in the Brimbank area.

72. Dear Premier, Ministers, Mayor, And Councilors

I write to you as one of more than 1300 signatories objecting to this development as outlined in the attached letter and provide below the basis from which I felt the need to make this submission.

In the midst of a pandemic, lockdown and curfew, an attempt to pass the first process of community consultation by erecting a simple, small and basic board in an area with near-zero exposure and letters to a couple of dozen homes where English is a second

language or no English at all, is hardly transparent and does not take into account residents views, concerns or suggestions. I ask you, wasn't consultation in the act intended to hear all affected parties views?

Baptcare claims the overwhelming majority of those with a need for social housing indicated Keilor Downs as their first preference but have provided no evidence to that effect. Instead, it suggests to me the Big Build funding may be at the core of their interest and ignores the current needs and makeup of Keilor downs and we ask the state government to demand this research be released in the interest of open and transparent communication.

For these reasons, I ask for your support to re-consider the development and its purpose in Keilor Downs. These decisions must be made with the appropriate level of Community engagement for best outcomes and respectfully ask for your assistance.

73. Dear Premier, Ministers, Mayor, Councilors and Mr Gleeson

I write to you as one of more than 1300 signatories objecting to this development as outlined in the attached letter and provide below the basis from which I felt the need to make this submission.

In the midst of a pandemic, lockdown and curfew, an attempt to pass the first process of community consultation by erecting a simple, small and basic board in an area with near zero exposure and letters to a couple of dozen homes where English is a second language or no English at all, is hardly transparent and does not take into account residents views, concerns or suggestions. I ask you, wasn't consultation in the act intended to hear all affected parties views?

In a meeting with Baptcare, URBIS and their architects CHC on Tuesday October 19, Baptcare told me there would be a maximum of sixty five or seventy people living across the 47 proposed units which suggests the one bedroom units will never accommodate more than a single person. We have also been told the need for the build in the area is a result of research indicating it has one of the highest rates of homelessness in Victoria, to which council concurred at their Tuesday evening meeting when in fact this is inaccurate based on ABS data, as was their understanding of many issues including but not limited to,

- Whether the proposal was for 'Social housing' or 'Affordable Housing';
- How many dwellings were proposed;
- The proposed number of levels which were to be built;
- The location of the build;
- The proposed changes to the surrounding land which retains approvals for further developments; and

After the council meeting Tuesday night, I sent a message to all councilors expressing my disappointment at the lack of consideration and sensitivity and received a text message (attached) from a councilor with the following;

"I wouldn't take it to heart. The Minister are (sic) there (sic) more likely throw in (sic) on the of community submissions anyway. You did well for the community. This is the contempt we have faced.

During the URBIS/Baptcare meeting Tuesday, I was told proposed residents would be **“people who already live in the area”** but this is not true and when questioned, they agreed people could be pulled in from many different suburbs and not just Keilor Downs and flies in the face of their flawed claims the area has one of the highest homelessness rates in Victoria or their “desire to help people in our immediate community”. Instead, I believe the Baptcare proposal is an opportunistic move for funding from the Big Build, and not from concern for our community and this is further evidenced by their annual report showing revenue of \$270M in 2020 of which \$202M was government grants.

Baptcare also claim overwhelming majority of those with a need for social housing indicated Keilor Downs as their first preference but have provided no evidence to that effect. Instead it suggests to me the Big Build funding may be at the core of their interest and ignores the current needs and make up of Keilor downs and we ask the state government demand this research be released in the interest of open and transparent communication.

For these reasons and as per the attached, I ask for your support to re-consider the development and its purpose in Keilor Downs. These decisions must be made with the appropriate level of Community engagement for best outcomes and respectfully ask for your assistance.

Regards,
[name redacted]
[phone number redacted] or reply to this email [redacted]

References:

1. Brimbank Council Meeting Minutes (19 October 2021)

<https://www.brimbank.vic.gov.au/council/council-meetings/2021-council-meeting-agendas-and-minutes>

<https://www.youtube.com/playlist?list=PLEw1sHlvzDqGbWOKNATAvxzD29bhvIDIB> (note: Recording is yet to be uploaded)

2. ABS Census of population and housing estimating homelessness

<https://www.abs.gov.au/statistics/people/housing/census-population-and-housing-estimating-homelessness/2016>

74.

HI.

Similar recent developments of this type - low rise/ high density with lower socio-economic demographics have led to a significant uplift in shoplifting, petty crime, begging, aggressive and disruptive behaviour, and drug and alcohol abuse which has a detrimental effect especially when located adjacent to shopping centres. Have any surveys into this type of behaviour or problems been carried out by the developer or planners? If so, we request to review the results.

Our property value will drop.

Regards

| | |
|-----|---|
| 75. | <p>Dear Madam/Sir</p> <p>I object to the proposed affordable housing development in Keilor Downs.</p> <p>The schools are at breaking point, filled to capacity with a high number of already vulnerable children. The gps are at breaking point looking after many people with a hugely diverse background from 40 different nationalities underrepresented. Sunshine hospital is also on the verge of collapse with people waiting in ambulances for over 8 hours. Lack of transport, the bus takes 40 minutes to get to the train station, no parking at the train station and lack of services. Aged care is sub par and there is no mental health support, no youth support, no youth services. Lack of jobs in the area. Older hard working neighbourhood.</p> <p>The suburb is already struggling at capacity and poverty is settling in with many people with mental health issues and no jobs, on the street and begging for money.</p> <p>Please reconsider an alternate area.</p> |
| 76. | <p>Dear Phil</p> <p>Please accept my objection to the proposed Baptcare development at 21A Copernicus Way, Keilor Downs.</p> <p>We, the Keilor Downs community, have many concerns about this proposal that are included in the attachment. Please note we are not against social housing, rather the clustering of social housing in this proposal. This clustering will not help the new residents assimilate to the area and will not improve the amenity of Keilor Downs.</p> <p>I sincerely hope that you understand and take into consideration the existing residents of Keilor Downs and the already stretched resources in the area.</p> |
| 77. | <p>Dear Madam/Sir</p> <p>I object to the proposed affordable housing development in Keilor Downs.</p> <p>The schools are at breaking point, filled to capacity with a high number of already vulnerable children. The gps are at breaking point looking after many people with a hugely diverse background from 40 different nationalities underrepresented. Sunshine hospital is also on the verge of collapse with people waiting in ambulances for over 8 hours. Lack of transport, the bus takes 40 minutes to get to the train station, no parking at the train station and lack of services. Aged care is sub par and there is no mental health support, no youth support, no youth services. Lack of jobs in the area. Older hard working neighbourhood.</p> <p>The suburb is already struggling at capacity and poverty is settling in with many people with mental health issues and no jobs, on the street and begging for money.</p> <p>Please reconsider an alternate area.</p> |
| 78. | <p>To whom it may concern,</p> <p>I came across a petition objection to Housing Development in Keilor Downs. Before signing the petition I wanted to clarify the planning outline for this development, for who is it being developed for. My initial understanding was that it was being built as a retirement village, something I welcome and would be a great addition to the areaparticularly with the newly established \$50million Wellness centre. Now it seems as though it will be developed as commission housing. Please confirm the project plans in Plain English with me, to inform my decision on whether to participate and share the petition forum.</p> <p>Kindest regards,</p> |

79. To whom it may concern,

Having grown up in Keilor Downs (approx 27 years) im absolutely appalled & horrified that such dangerous & invasive development could be proposed let alone bypass basic planning protocols in comparison to other residential developments such as unit subdivisions. I also question how compliant the design is under siting regulations? This development is inappropriate for this area. The area has seen positive gentrification over the last few years with young families moving into the area. My brother who has always lived in the area also became part of this trend by purchasing a house with his wife so he could live close by to our parents. Going into the future the long term older residents (including my parents) would benefit much more if this site was turned into nursing home or retirement village so older people can downsize and comfortably remain in an area which they are familiar and which is still safe due to the mass exodus of low socio economic demographic that infiltrated the area 10 or so years ago. Keilor Downs has returned to Grand & Family orientated area. It should be kept that way.

80. Dear Honorable Minister

There are now well over 1000 signatories objecting to this proposal and that's in the midst of a lockdown and a curfew. A mere single A1 board hardly visible to the locals who for four years were led to believe an aged care home was to be built on that site has now been changed to a completely different plan and with no discussion about the infrastructure, safety and density concerns by the very people who have helped elect you time and time again.

Within a 300M zone there is currently 109 Units still be completed, another 30+ in Packard Street and the existing nursing home. How exactly does government support the proposed addition of 47 Units in such a tiny parcel of land when current residents cant;

- (1) Get a parking spot on weekends to do shopping
- (2) There is never any room for disabled parking
- (3) Beggars are at the front entrance
- (4) We are scared to enter from the rear car park at night
- (5) Our alleyways are littered with empty alcohol bottles
- (6) Our home are cased regularly and police can only do a simple drive by
- (7) Police are regularly in attendance when packs of men raid the supermarket
- (8) Etc: etc:

Residents are not opposed to social housing but are opposed to such a big project on such a small parcel of land when the underlying foundations are weak at best. We expected the government to fix those problems but instead you want to throw a few more our way. Keilor Downs has always had one in ten homes set aside for social housing but this proposal is simply outrageous.

We would appreciate our concerns being taken seriously with active involvement and no more of this palming us off

to different departments within a bureaucracy many just don't understand.

We await your reply

81.

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We would appreciate our concerns being taken seriously with active involvement and no more of this palming us off to different departments within a bureaucracy many just don't understand.

We await your reply

82.

Dear all

I am a resident of Keilor Downs, and have lived here my entire life - close to four decades. I have seen the rise and fall and rise again of this suburb. In my humble opinion, Keilor Downs is at its peak. Finally, decent facilities are available and the shopping centre is becoming more gentrified. Most relevantly, the demography of the area is acutely improving, so much so, that I am now not afraid to walk the streets at night. I would not have said this a few years ago.

I am disgusted that as a resident who lives four streets from this proposed development, I was not consulted in any way. The first I heard about it was through a flyer in my letter box as a result of distressed neighbours trying to spread the word. This is my area, and I am proud to live here. However, I fear for the future of Keilor Downs, if this proposal is approved and built. Putting aside the disastrous social consequences that will flow, what a waste of an otherwise perfect block of land that could be used to improve the area even more. Why can't that area be used to house restaurants and cafes and a cinema, like "Station Street" at Watergardens? Or, why can't it be used to build a retirement village, to allow Keilor Downs' long term elderly residents to remain in the area they love, but with the support they require?

The prices in Keilor Downs are skyrocketing, and for good reason. People have realised how desirable a place it is to live. Please don't destroy the community I love, and for which I have helped mould.

There is absolutely no certainty what sorts of persons will be able to use this affordable housing. Will they be parolees? Will they be drug addicts? Why should we have to put up with this, when it was never put to a vote, or where the residents have not had adequate opportunity to voice their disapproval!?

There are so many empty apartment blocks in the CBD. If there is a need for affordable housing, why can't the Government rent out those apartments to residents in need (thereby also relieving the mortgage stress of the owners)? If there is nothing to fear by these residents, why hasn't that been considered an option? Or, is it easier to just dump them in a "safe Labor" seat in the northwest? The contempt shown for the salt of the earth, hard working, people of this suburb is nothing short of appalling.

I hope you don't just dismiss the significant outrage that this proposed development has caused. People are genuinely upset by this, and we beg you - please do not destroy our great suburb.

83. To whom it may concern,

I came across a petition objection to Housing Development in Keilor Downs. Before signing the petition I wanted to clarify the planning outline for this development, for who is it being developed for. My initial understanding was that it was being built as a retirement village, something I welcome and would be a great addition to the area particularly with the newly established \$50million Wellness centre. Now it seems as though it will be developed as commission housing. Please confirm the project plans in Plain English with me, to inform my decision on whether to participate and share the petition forum.

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[MIN079968](#)

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Lack of Community Consultation and Culturally inclusive practice.

We were informed about this proposal recently from our neighbours who live within 150 meters of the proposed construction, or via viewing of the obscurely located planning advice sign. Subsequently, a community consultation meeting about the proposal was conducted by Bapcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project (estimated at no more than 15 residents), as one side is the plaza, another is the new aquatics centre, another is vacant land and finally, the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area that isn't often frequented by foot and is not accessible by car and is additionally over 150m from the construction location.

A lack of appropriate community consultation of those affected by the development has especially aggrieved residents and is also non-compliant to Clause 52.20 on which this development's proposal is based upon.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represents an elderly demographic including those within 150 meters. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English, and additionally, no alternative language service is available to understand the planning information. Some residents were able to

attend the recent consultation meeting with Bapcare via Zoom, however, measures were not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project who are not familiar with technology services. It was evident from the meeting that this demographic was not present, and their voice continues to not have been heard.

In addition to this, there has been no consideration of the COVID-19 restrictions that are placed on the communities in Melbourne and the subsequent difficulty in access to information relating to this development; being that the only publicly available information is the obscurely positioned sign. This is further evidenced by the community itself forming this document, of its own volition, with almost all residents being made aware via word of mouth.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place a further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions. Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above. To date, this information remains unavailable, unclear and unverified of fact.

We understand that Baptcare has owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Baptcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an aging population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Baptcare has changed their plan of building a retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected. This is further supported by the significant lack of community consultation.

Density, the impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its aging population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Baptcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community,

particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an aging population. High-density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and are evident via the active petition that is currently in progress.

We direct you to Annex A and Annex B of this document for the persons who oppose this development and further evidence of the non-compliance to Clause 52.20.

Annex A - Individuals who oppose this development

Please find at the following link over 1000 local residents who are opposed to this development. Each of these individuals is to be considered as a formal respondent to this objection and as such included in Baptcare's formal review paper than is supplied to the State Government or its Representatives in accordance with Clause 52.20 (Department of Health and Human Services or the Director of Housing)

Current petition for rejection: https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilordowns?fbclid=IwAR10U3M1B4S21a_Z1SfZUc2lq1zQYOYb1U3GuFPIfU0g0-Zw3V0P-Zmswiw

Annex B - Technical Assessment of Baptcare's Planning Reports

This assessment is generated from the following publically available reports:

[Baptcare Affordable Housing](#)

General Concerns:

1. This development is for 47 dwelling of unknown inhabitant numbers, however, it can be assumed that approximately 150 people will occupy this area. Given the significant numbers of inhabitants and dwellings being built, it is inappropriate that the distribution of advice relating to this build was only provided to a 150m radius of the build location. This is unlikely to have reached more than 15 dwellings. There will be significant impact to the surrounding area, including schools, public facilities (parks

etc), community facilities (gyms/pools), retail and shopping facilities, of which the Keilor Downs community regularly utilise. The majority of the user community will remain unaware of this development. Furthermore it is with great disappointment that the COVID-19 restrictions were not taken into considerations, nor was the local council engaged for possible email sharing of this information. This has led to significantly inadequate sharing of the significance of 47 additional dwellings being built which would constitute the volume of dwellings along a 1km stretch of road in this area

a. **This is inappropriate and requested to be addressed.**

2. Given the type of dwellings and number, this will no doubt have a significant impact on the house values within a far greater radius than 150m. Initial assessments would indicate the impact to be to no less than 3km surrounding the development. This has not been addressed in the reports and consideration has not been provided to this effect.

a. **This is inappropriate and must be addressed for the impacted community.**

3. The general Social Housing policy of 'One in Nine' is a method of disbursing social housing tenants throughout the community. This is in recognition of best practice australia wide, being that people experiencing disadvantage are far more likely to move along the housing continuum and out of disadvantage when they are part of a socially diverse community: rather than collate the disadvantaged community together in a complex that, over time, will only erode and decay into another block of social housing 'flats' like those already existing around areas of Melbourne. Additionally, the City's own policy, requires any development not subject future occupants to undesirable levels of disturbance and/or nuisance.

4. In addition to para 3. This development will house disadvantaged individuals in a single location further putting pressure on community well being.

a. **This is non-compliant** with Clause 21.03-1.

5. Given the impact of social housing on local emergency services, and the significant number of new dwellings being built, there has been no review or consideration on the demand for local emergency services.

a. This is a significant oversight.

6. The location of the development is in a Commercial Zone 1.

a. **This is non-compliant** inconsistent with the normal General Residential or Residential Growth Zone requirements to produce high density dwellings (ref Clause 21.02)

Town Planning Report Concerns:

1. The development of 47 dwellings and estimated 150 inhabitants is likely to result in no less than approximately 60 cars (based on unit distributions). A single car park appears to be poorly assessed, despite it passing Clause 52.20 basic requirements.

2. The planning report notes that this project is developed adjacent to a proposed aged care facility (future). This appears to be inconsistent and provides no assessment of the future transport requirements for the land parcel.

3. Clause 15.01-2S: Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.

a. **Non-compliant.** Property values will be significantly impacted. The proposed dwellings are inconsistent with all properties in the local area (proposed are high density - existing are not high density). incomplete consideration of parking requirements (only 47 spaces provided, well below assessed inhabitant requirements).

4. Clause 15.01-5S: Pattern of local urban structure and subdivision. Heritage values and built form that reflect community identity.

a. **Non-compliant.** There has been no consideration of the local housing representation which have existed for over 50 years. The new development is inconsistent in size/look/feel of the entire suburb.

5. Clause 21.02-3: Apply the Commercial 1 Zone to facilitate retail uses and mixed use development consistent with the primary purpose of the zone.

a. **Non-compliant.** This development is only residential in purpose. There is zero foreseeable consideration for this clause in the development. It has not been addressed.

6. Clause 21.04: Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.

a. **Non-compliant.** The significance of moving from large parcel property of single dwellings immediately to high density dwellings is inconsistent.

7. Section 6.1: These statements are inconsistent with the requirements of Commercial Zone 1 and do not appear to be logical. Further detail and a re-write of the presented statements is essential.

a. **Non-Compliant.** There is no logic to the proposed project achieving any of the requirements of this Commercial Zone 1 requirements.

8. Section 6.3: Incorrectly states that this site is not subject to the Special Building Overlay.

a. **Non-Compliant.** All Land data states clearly that this site is subject to DCPO - Development Contributions Plan Overlay - Schedule 2, DPO - Development Plan Overlay - Schedule 2, **SBO - Special Building Overlay.** Significant oversight on the planning report.

9. Section 6.5: Car parking assessment has been poorly conducted as previously stated throughout this correspondence.

10. Section 7.1: Brimbank Planning Policy Framework assessments: There is no assessment of the Keilor Downs Urban Design Framework document.

a. **This appears to be a significant oversight.**

11. Section 7.2: Land use. The statements here are inconsistent with the Commercial Zone 1 framework as previously explained in General Concerns 6. The large scale of proposed density may be appropriate for the proximity to the shopping area, but it is not consistent with a smooth transition between the low density dwellings immediately adjacent to the area.

a. **This appears to be a significant oversight.**

12. Section 7.8: As previously stated throughout this Correspondence, the stated allocation of parking is inconsistent and appears to be poorly calculated. This will undoubtedly result in additional parking outflows into the general residential area.

13. General: Of the Town Planning Report, there is a significant noncompliance that has been observed. From Clause 52.20-04: **Consultation**

requirements *Before the use or development commences: Public*

consultation, and consultation with the relevant municipal council, must be undertaken. A report that summarises the consultation undertaken,

feedback received, and explains how the feedback has been considered

and responded to must be prepared to the satisfaction of the responsible authority

a. **Non-Compliant.** Public information sharing appears to have been poorly conducted, with sharing of relevant data and planning information to the community of keilor downs being assessed as significantly inappropriate. There has been little effort to share information with only a 150m radius of residential sites being advised of such a large build with implications to the wider community being ignored. The majority of the community has only been able to find the relevant information via the physical standing advice board at the site. Noting the impacts of COVID-19 and the relevant restrictions, this can only be reviewed as poorly considered and completely void of community impact assessment.

Transport Impact Assessment Concerns:

Parking assessments and driving assessments from the annexes of the document (by Onemilegrid). These parking diagrams show a barely achievable parking assessment, additionally is of note the 'impact' to the internal garage space with each vehicle diagram showing that the standard vehicle diagrams cannot fit within the garage. This is not consistent or appropriate with a reasonable assessment of parking conditions. Entry has not been considered. The presented turning radii do not appear to be achievable (specifically the 'red' vehicle in the diagram at Figure 1)

a. **This is inappropriate and inconsiderate, additionally it can be considered unsafe.**

Figure 1 - Extract from Baptcare Public Reports

Conclusion:

In accordance with the exhaustive list of non-compliant, inappropriate and inconsistent statements in the provided reports, supported by the list of general concerns and poor circulation of information relating to the project providing clear non-compliance to sections required to get to this stage of planning as follows:

1. 52.20-1
2. 52.20-3
3. 52.20-4
4. 52.20-6.4

We request cancellation of this proposal and that reconsideration of the future planning in the area is conducted in a manner which is commensurate to and

supportive of the local community needs. All reconsideration must be achieved through community input and via the required council planning solutions established in the Brimbank area.

Best Regards,

85. **Re: Baptistcare development of 21A Copernicus Way, Keilor Downs**

We (read: the respondents identified at Annex A of this document) are writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Baptistcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. We live in Keilor Downs, many with young families and many who have been residents of Brimbank for over 20 years. Of this community there are those in various areas of employment, including professionals in the Health and Community Services sector with extensive experience and support the awareness of the needs of communities that the project would target.

There are several key planning issues with the proposal we request consideration of and accordingly an appropriate response to, additionally supported by an exhaustive list on non-compliant and poorly considered planning solutions identified at Annex B of this document.

Lack of Community Consultation and Culturally inclusive practice.

We were informed about this proposal recently from our neighbours who live within 150 metres of the proposed construction, or via viewing of the obscurely located planning advice sign. Subsequently, a community consultation meeting about the proposal was conducted by Baptistcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project (estimated at no more than 15 residents), as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area which isn't often frequented by foot and is not accessible by car, and is additionally over 150m from the construction location. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents and is also non-compliant to Clause 52.20 of which this development's proposal is based upon.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English, and additionally, no alternative language service is available to understand the planning information. Some residents were able to attend the recent consultation meeting with Baptistcare via Zoom, however measures were not taken to include those elderly citizens, both English and non-English speaking, that live

closer to the proposed project whom are not familiar with technology services. It was evident from the meeting that this demographic was not present, and their voice continues to not have been heard.

In addition to this, there has been no consideration of the COVID-19 restrictions that are placed on the communities in Melbourne and the subsequent difficulty in access to information relating to this development; being that the only publicly available information is the obscurely positioned sign. This is further evidenced by the community itself forming this document, of it's own volition, with almost all residents being made aware via word of mouth.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above. To date, this information remains unavailable, unclear and unverified of fact.

We understand that Bapcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Bapcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Bapcare have changed their plan of building a retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected. This is further supported by the significant lack of community consultation.

Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Bapcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

We direct you to Annex A and Annex B of this document for the persons who oppose this development and further evidence of the non-compliance to Clause 52.20.

Annex A - Individuals who oppose this development

Please find at the following link over 1000 local residents who are opposed to this development. Each of these individuals is to be considered as a formal respondent to this objection and as such included in Baptcare's formal review paper than is supplied to the State Government or its Representatives in accordance with Clause 52.20 (Department of Health and Human Services or the Director of Housing)

Current petition for rejection: https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilor-downs?fbclid=IwAR10U3M1B4S21a_Z1SfZUc2lq1zQYOYb1U3GuFPfU0q0-Zw3V0P-Zmswiw

Annex B - Technical Assessment of Baptcare's Planning Reports

This assessment is generated from the following publically available reports:

<https://www.baptcare.org.au/services/housing/affordable-housing>

General Concerns:

1. This development is for 47 dwelling of unknown inhabitant numbers, however, it can be assumed that approximately 150 people will occupy this area. Given the significant numbers of inhabitants and dwellings being built, it is inappropriate that the distribution of advice relating to this build was only provided to a 150m radius of the build location. [REDACTED]. There will be significant impact to the surrounding area, including schools, public facilities (parks etc), community facilities (gyms/pools), retail and shopping facilities, of which the Keilor Downs community regularly utilise. The majority of the user community will remain unaware of this development. [REDACTED]
 - b. **This is inappropriate and requested to be addressed.**
2. Given the type of dwellings and number, this will no doubt have a significant impact on the house values within a far greater radius than 150m. Initial assessments would indicate the impact to be to no less than 3km surrounding the development. This has not been addressed in the reports and consideration has not been provided to this effect.
 - b. **This is inappropriate and must be addressed for the impacted community.**
3. The general Social Housing policy of 'One in Nine' is a method of disbursing social housing tenants throughout the community. This is in recognition of best practice australia wide, being that people experiencing disadvantage are far more

likely to move along the housing continuum and out of disadvantage when they are part of a socially diverse community: rather than collate the disadvantaged community together in a complex that, over time, will only erode and decay into another block of social housing 'flats' like those already existing around areas of Melbourne. Additionally, the City's own policy, requires any development not subject future occupants to undesirable levels of disturbance and/or nuisance.

4. In addition to para 3. This development will house disadvantaged individuals in a single location further putting pressure on community well being.
 - b. **This is non-compliant** with Clause 21.03-1.
5. Given the impact of social housing on local emergency services, and the significant number of new dwellings being built, there has been no review or consideration on the demand for local emergency services.
 - b. **This is a significant oversight**.
6. The location of the development is in a Commercial Zone 1.
 - b. **This is non-compliant** inconsistent with the normal General Residential or Residential Growth Zone requirements to produce high density dwellings (ref Clause 21.02)

Town Planning Report Concerns:

1. The development of 47 dwellings and estimated 150 inhabitants is likely to result in no less than approximately 60 cars (based on unit distributions). A single car park appears to be poorly assessed, despite it passing Clause 52.20 basic requirements.
2. The planning report notes that this project is developed adjacent to a proposed aged care facility (future). This appears to be inconsistent and provides no assessment of the future transport requirements for the land parcel.
3. Clause 15.01-2S: Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.
 - b. **Non-compliant.** Property values will be significantly impacted. The proposed dwellings are inconsistent with all properties in the local area (proposed are high density - existing are not high density). Incomplete consideration of parking requirements (only 47 spaces provided, well below assessed inhabitant requirements).
4. Clause 15.01-5S: Pattern of local urban structure and subdivision. Heritage values and built form that reflect community identity.
 - b. **Non-compliant.** There has been no consideration of the local housing representation which have existed for over 50 years. The new development is inconsistent in size/look/feel of the entire suburb.
5. Clause 21.02-3: Apply the Commercial 1 Zone to facilitate retail uses and mixed use development consistent with the primary purpose of the zone.
 - b. **Non-compliant.** This development is only residential in purpose. There is zero foreseeable consideration for this clause in the development. It has not been addressed.

6. Clause 21.04: Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.
 - b. **Non-compliant.** The significance of moving from large parcel property of single dwellings immediately to high density dwellings is inconsistent.
7. Section 6.1: These statements are inconsistent with the requirements of Commercial Zone 1 and do not appear to be logical. Further detail and a re-write of the presented statements is essential.
 - b. **Non-Compliant.** There is no logic to the proposed project achieving any of the requirements of this Commercial Zone 1 requirements.
8. Section 6.3: Incorrectly states that this site is not subject to the Special Building Overlay.
 - b. **Non-Compliant.** All Land data states clearly that this site is subject to DCPO - Development Contributions Plan Overlay - Schedule 2, DPO - Development Plan Overlay - Schedule 2, **SBO - Special Building Overlay.** Significant oversight on the planning report.
9. Section 6.5: Car parking assessment has been poorly conducted as previously stated throughout this correspondence.
10. Section 7.1: Brimbank Planning Policy Framework assessments: There is no assessment of the Keilor Downs Urban Design Framework document.
 - b. **This appears to be a significant oversight.**
11. Section 7.2: Land use. The statements here are inconsistent with the Commercial Zone 1 framework as previously explained in General Concerns 6. The large scale of proposed density may be appropriate for the proximity to the shopping area, but it is not consistent with a smooth transition between the low density dwellings immediately adjacent to the area.
 - b. **This appears to be a significant oversight.**
12. Section 7.8: As previously stated throughout this Correspondence, the stated allocation of parking is inconsistent and appears to be poorly calculated. This will undoubtedly result in additional parking outflows into the general residential area.
13. General: Of the Town Planning Report, there is a significant non-compliance that has been observed. From Clause 52.20-04: Consultation requirements Before the use or development commences: Public consultation, and consultation with the relevant municipal council, must be undertaken. A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to must be prepared to the satisfaction of the responsible authority
 - b. **Non-Compliant.** Public information sharing appears to have been poorly conducted, with sharing of relevant data and planning information to the community of keilor downs being assessed as significantly inappropriate. There has been little effort to share information with only a 150m radius of residential sites being advised of such a large build with implications to the wider community being ignored. The majority of the community has only been able to find the relevant information via the physical standing advice board at the site. Noting the impacts of COVID-19 and the relevant restrictions, this can only be reviewed as poorly considered and completely void of community impact assessment.

Transport Impact Assessment Concerns:

Parking assessments and driving assessments from the annexes of the document (by Onemilegrid). These parking diagrams show a barely achievable parking assessment, additionally is of note the 'impact' to the internal garage space with each vehicle diagram showing that the standard vehicle diagrams cannot fit within the garage. This is not consistent or appropriate with a reasonable assessment of parking conditions. Entry has not been considered. The presented turning radii do not appear to be achievable (specifically the 'red' vehicle in the diagram at Figure 1)

- b. **This is inappropriate and inconsiderate, additionally it can be considered unsafe.**

Figure 1 - Extract from Baptcare Public Reports



Conclusion:

In accordance with the exhaustive list of non-compliant, inappropriate and inconsistent statements in the provided reports, supported by the list of general concerns and poor circulation of information relating to the project providing clear non-compliance to sections required to get to this stage of planning as follows:

5. 52.20-1
6. 52.20-3

7. 52.20-4
8. 52.20-6.4

We request cancellation of this proposal and that reconsideration of the future planning in the area is conducted in a manner which is commensurate to and supportive of the local community needs. All reconsideration must be achieved through community input and via the required council planning solutions established in the Brimbank area.

86. **Re: Baptistcare development of 21A Copernicus Way, Keilor Downs**

We (read: the respondents identified at Annex A of this document) are writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Baptistcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. We live in Keilor Downs, many with young families and many who have been residents of Brimbank for over 20 years. Of this community there are those in various areas of employment, including professionals in the Health and Community Services sector with extensive experience and support the awareness of the needs of communities that the project would target.

There are several key planning issues with the proposal we request consideration of and accordingly an appropriate response to. additionally supported by an exhaustive list on non-compliant and poorly considered planning solutions identified at Annex B of this document.

Lack of Community Consultation and Culturally inclusive practice.

We were informed about this proposal recently from our neighbours who live within 150 metres of the proposed construction, or via viewing of the obscurely located planning advice sign. Subsequently, a community consultation meeting about the proposal was conducted by Baptistcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project (estimated at no more than 15 residents), as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area which isn't often frequented by foot and is not accessible by car, and is additionally over 150m from the construction location. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents and is also non-compliant to Clause 52.20 of which this development's proposal is based upon.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English, and additionally, no alternative language service is available to understand the planning information. Some residents were able to attend the recent consultation meeting with Baptcare via Zoom, however measures were not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project whom are not familiar with technology services. It was evident from the meeting that this demographic was not present, and their voice continues to not have been heard.

In addition to this, there has been no consideration of the COVID-19 restrictions that are placed on the communities in Melbourne and the subsequent difficulty in access to information relating to this development; being that the only publicly available information is the obscurely positioned sign. This is further evidenced by the community itself forming this document, of it's own volition, with almost all residents being made aware via word of mouth.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above. To date, this information remains unavailable, unclear and unverified of fact.

We understand that Baptcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Baptcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Baptcare have changed their plan of building a retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected. This is further supported by the significant lack of community consultation.

Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Baptcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

We direct you to Annex A and Annex B of this document for the persons who oppose this development and further evidence of the non-compliance to Clause 52.20.

Annex A - Individuals who oppose this development

Please find at the following link over 1000 local residents who are opposed to this development. Each of these individuals is to be considered as a formal respondent to this objection and as such included in Baptcare's formal review paper than is supplied to the State Government or its Representatives in accordance with Clause 52.20 (Department of Health and Human Services or the Director of Housing)

Current petition for rejection: https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilor-downs?fbclid=IwAR10U3M1B4S21a_Z1SfZUc2lq1zQYOYb1U3GuFPifU0g0-Zw3V0P-Zmswiw

Annex B - Technical Assessment of Baptcare's Planning Reports

This assessment is generated from the following publically available reports:
<https://www.baptcare.org.au/services/housing/affordable-housing>

General Concerns:

1. This development is for 47 dwelling of unknown inhabitant numbers, however, it can be assumed that approximately 150 people will occupy this area. Given the significant numbers of inhabitants and dwellings being built, it is inappropriate that the distribution of advice relating to this build was only provided to a 150m radius of the build location. [REDACTED]
[REDACTED] There will be significant impact to the surrounding area, including schools, public facilities (parks etc), community facilities (gyms/pools), retail and shopping facilities, of which the Keilor Downs community regularly utilise. The majority of the user community will remain unaware of this development. [REDACTED]
[REDACTED]
c. This is inappropriate and requested to be addressed.

2. Given the type of dwellings and number, this will no doubt have a significant impact on the house values within a far greater radius than 150m. Initial assessments would indicate the impact to be to no less than 3km surrounding the development. This has not been addressed in the reports and consideration has not been provided to this effect.
 - c. **This is inappropriate and must be addressed for the impacted community.**
3. The general Social Housing policy of 'One in Nine' is a method of disbursing social housing tenants throughout the community. This is in recognition of best practice australia wide, being that people experiencing disadvantage are far more likely to move along the housing continuum and out of disadvantage when they are part of a socially diverse community: rather than collate the disadvantaged community together in a complex that, over time, will only erode and decay into another block of social housing 'flats' like those already existing around areas of Melbourne. Additionally, the City's own policy, requires any development not subject future occupants to undesirable levels of disturbance and/or nuisance.
4. In addition to para 3. This development will house disadvantaged individuals in a single location further putting pressure on community well being.
 - c. **This is non-compliant** with Clause 21.03-1.
5. Given the impact of social housing on local emergency services, and the significant number of new dwellings being built, there has been no review or consideration on the demand for local emergency services.
 - c. This is a significant oversight.
6. The location of the development is in a Commercial Zone 1.
 - c. **This is non-compliant** inconsistent with the normal General Residential or Residential Growth Zone requirements to produce high density dwellings (ref Clause 21.02)

Town Planning Report Concerns:

1. The development of 47 dwellings and estimated 150 inhabitants is likely to result in no less than approximately 60 cars (based on unit distributions). A single car park appears to be poorly assessed, despite it passing Clause 52.20 basic requirements.
2. The planning report notes that this project is developed adjacent to a proposed aged care facility (future). This appears to be inconsistent and provides no assessment of the future transport requirements for the land parcel.
3. Clause 15.01-2S: Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.
 - c. **Non-compliant.** Property values will be significantly impacted. The proposed dwellings are inconsistent with all properties in the local area (proposed are high density - existing are not high density). incomplete consideration of parking requirements (only 47 spaces provided, well below assessed inhabitant requirements).
4. Clause 15.01-5S: Pattern of local urban structure and subdivision. Heritage values and built form that reflect community identity.
 - c. **Non-compliant.** There has been no consideration of the local housing representation which have existed for over 50 years. The new development is inconsistent in size/look/feel of the entire suburb.

5. Clause 21.02-3: Apply the Commercial 1 Zone to facilitate retail uses and mixed use development consistent with the primary purpose of the zone.
 - c. **Non-compliant.** This development is only residential in purpose. There is zero foreseeable consideration for this clause in the development. It has not been addressed.
6. Clause 21.04: Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.
 - c. **Non-compliant.** The significance of moving from large parcel property of single dwellings immediately to high density dwellings is inconsistent.
7. Section 6.1: These statements are inconsistent with the requirements of Commercial Zone 1 and do not appear to be logical. Further detail and a re-write of the presented statements is essential.
 - c. **Non-Compliant.** There is no logic to the proposed project achieving any of the requirements of this Commercial Zone 1 requirements.
8. Section 6.3: Incorrectly states that this site is not subject to the Special Building Overlay.
 - c. **Non-Compliant.** All Land data states clearly that this site is subject to DCPO - Development Contributions Plan Overlay - Schedule 2, DPO - Development Plan Overlay - Schedule 2, **SBO - Special Building Overlay.** Significant oversight on the planning report.
9. Section 6.5: Car parking assessment has been poorly conducted as previously stated throughout this correspondence.
10. Section 7.1: Brimbank Planning Policy Framework assessments: There is no assessment of the Keilor Downs Urban Design Framework document.
 - c. **This appears to be a significant oversight.**
11. Section 7.2: Land use. The statements here are inconsistent with the Commercial Zone 1 framework as previously explained in General Concerns 6. The large scale of proposed density may be appropriate for the proximity to the shopping area, but it is not consistent with a smooth transition between the low density dwellings immediately adjacent to the area.
 - c. **This appears to be a significant oversight.**
12. Section 7.8: As previously stated throughout this Correspondence, the stated allocation of parking is inconsistent and appears to be poorly calculated. This will undoubtedly result in additional parking outflows into the general residential area.
13. General: Of the Town Planning Report, there is a significant non-compliance that has been observed. From Clause 52.20-04: Consultation requirements Before the use or development commences: Public consultation, and consultation with the relevant municipal council, must be undertaken. A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to must be prepared to the satisfaction of the responsible authority
 - c. **Non-Compliant.** Public information sharing appears to have been poorly conducted, with sharing of relevant data and planning information to the community of keilor downs being assessed as significantly inappropriate. There has been little effort to share information with only a 150m radius of residential sites being advised of such a large build with implications to the wider community being ignored. The majority of the community has only been able to find the relevant information via the physical standing advice board at the site. Noting the impacts of COVID-19 and the

relevant restrictions, this can only be reviewed as poorly considered and completely void of community impact assessment.

Transport Impact Assessment Concerns:

Parking assessments and driving assessments from the annexes of the document (by Onemilegrid). These parking diagrams show a barely achievable parking assessment, additionally is of note the 'impact' to the internal garage space with each vehicle diagram showing that the standard vehicle diagrams cannot fit within the garage. This is not consistent or appropriate with a reasonable assessment of parking conditions. Entry has not been considered. The presented turning radii do not appear to be achievable (specifically the 'red' vehicle in the diagram at Figure 1)

- c. **This is inappropriate and inconsiderate, additionally it can be considered unsafe.**

Figure 1 - Extract from Baptcare Public Reports



Conclusion:

In accordance with the exhaustive list of non-compliant, inappropriate and inconsistent statements in the provided reports, supported by the list of general concerns and poor circulation of information relating to the project providing clear non-compliance to sections required to get to this stage of planning as follows:

9. 52.20-1
10. 52.20-3
11. 52.20-4
12. 52.20-6.4

We request cancellation of this proposal and that reconsideration of the future planning in the area is conducted in a manner which is commensurate to and supportive of the local community needs. All reconsideration must be achieved through community input and via the required council planning solutions established in the Brimbank area.

87. **Re: Baptistcare development of 21A Copernicus Way, Keilor Downs**

We (read: the respondents identified at Annex A of this document) are writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Baptistcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. We live in Keilor Downs, many with young families and many who have been residents of Brimbank for over 20 years. Of this community there are those in various areas of employment, including professionals in the Health and Community Services sector with extensive experience and support the awareness of the needs of communities that the project would target.

There are several key planning issues with the proposal we request consideration of and accordingly an appropriate response to, additionally supported by an exhaustive list on non-compliant and poorly considered planning solutions identified at Annex B of this document.

Lack of Community Consultation and Culturally inclusive practice.

We were informed about this proposal recently from our neighbours who live within 150 metres of the proposed construction, or via viewing of the obscurely located planning advice sign. Subsequently, a community consultation meeting about the proposal was conducted by Baptistcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project (estimated at no more than 15 residents), as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage

has been hidden away in an area which isn't often frequented by foot and is not accessible by car, and is additionally over 150m from the construction location. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents and is also non-compliant to Clause 52.20 of which this development's proposal is based upon.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English, and additionally, no alternative language service is available to understand the planning information. Some residents were able to attend the recent consultation meeting with Baptcare via Zoom, however measures were not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project whom are not familiar with technology services. It was evident from the meeting that this demographic was not present, and their voice continues to not have been heard.

In addition to this, there has been no consideration of the COVID-19 restrictions that are placed on the communities in Melbourne and the subsequent difficulty in access to information relating to this development; being that the only publicly available information is the obscurely positioned sign. This is further evidenced by the community itself forming this document, of it's own volition, with almost all residents being made aware via word of mouth.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the

government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above. To date, this information remains unavailable, unclear and unverified of fact.

We understand that Baptcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Baptcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Baptcare have changed their plan of building a retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected. This is further supported by the significant lack of community consultation.

Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Baptcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched

community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

We direct you to Annex A and Annex B of this document for the persons who oppose this development and further evidence of the non-compliance to Clause 52.20.

Annex A - Individuals who oppose this development

Please find at the following link over 1000 local residents who are opposed to this development. Each of these individuals is to be considered as a formal respondent to this objection and as such included in Baptistcare's formal review paper than is supplied to the State Government or its Representatives in accordance with Clause 52.20 (Department of Health and Human Services or the Director of Housing)

Current petition for rejection: https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilor-downs?fbclid=IwAR10U3M1B4S21a_Z1SfZUc2lq1zQYOYb1U3GuFPIfU0q0-Zw3V0P-Zmswiw

Annex B - Technical Assessment of Baptistcare's Planning Reports

This assessment is generated from the following publically available reports:

<https://www.baptcare.org.au/services/housing/affordable-housing>

General Concerns:

1. This development is for 47 dwelling of unknown inhabitant numbers, however, it can be assumed that approximately 150 people will occupy this area. Given the significant numbers of inhabitants and dwellings being built, it is inappropriate that the distribution of advice relating to this build was only provided to a 150m radius of the build location. [REDACTED]. There will be significant impact to the surrounding area, including schools, public facilities (parks etc), community facilities (gyms/pools), retail and shopping facilities, of which the Keilor Downs community regularly utilise. The majority of the user community will remain unaware of this development [REDACTED].

- d. This is inappropriate and requested to be addressed.**
2. Given the type of dwellings and number, this will no doubt have a significant impact on the house values within a far greater radius than 150m. Initial assessments would indicate the impact to be to no less than 3km surrounding the development. This has not been addressed in the reports and consideration has not been provided to this effect.
- d. This is inappropriate and must be addressed for the impacted community.**
3. The general Social Housing policy of 'One in Nine' is a method of disbursing social housing tenants throughout the community. This is in recognition of best practice Australia wide, being that people experiencing disadvantage are far more likely to move along the housing continuum and out of disadvantage when they are part of a socially diverse community; rather than collate the disadvantaged community together in a complex that, over time, will only erode and decay into another block of social housing 'flats' like those already existing around areas of Melbourne. Additionally, the City's own policy, requires any development not subject future occupants to undesirable levels of disturbance and/or nuisance.
4. In addition to para 3. This development will house disadvantaged individuals in a single location further putting pressure on community well being.
- d. This is non-compliant** with Clause 21.03-1.
5. Given the impact of social housing on local emergency services, and the significant number of new dwellings being built, there has been no review or consideration on the demand for local emergency services.
- d. This is a significant oversight.**
6. The location of the development is in a Commercial Zone 1.
- d. This is non-compliant** inconsistent with the normal General Residential or Residential Growth Zone requirements to produce high density dwellings (ref Clause 21.02)

Town Planning Report Concerns:

1. The development of 47 dwellings and estimated 150 inhabitants is likely to result in no less than approximately 60 cars (based on unit distributions). A single car park appears to be poorly assessed, despite it passing Clause 52.20 basic requirements.
2. The planning report notes that this project is developed adjacent to a proposed aged care facility (future). This appears to be inconsistent and provides no assessment of the future transport requirements for the land parcel.
3. Clause 15.01-2S: Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.
 - d. Non-compliant.** Property values will be significantly impacted. The proposed dwellings are inconsistent with all properties in the local area (proposed are high density - existing are not high density), incomplete consideration of parking requirements (only 47 spaces provided, well below assessed inhabitant requirements).

4. Clause 15.01-5S: Pattern of local urban structure and subdivision. Heritage values and built form that reflect community identity.
 - d. **Non-compliant.** There has been no consideration of the local housing representation which have existed for over 50 years. The new development is inconsistent in size/look/feel of the entire suburb.
5. Clause 21.02-3: Apply the Commercial 1 Zone to facilitate retail uses and mixed use development consistent with the primary purpose of the zone.
 - d. **Non-compliant.** This development is only residential in purpose. There is zero foreseeable consideration for this clause in the development. It has not been addressed.
6. Clause 21.04: Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.
 - d. **Non-compliant.** The significance of moving from large parcel property of single dwellings immediately to high density dwellings is inconsistent.
7. Section 6.1: These statements are inconsistent with the requirements of Commercial Zone 1 and do not appear to be logical. Further detail and a re-write of the presented statements is essential.
 - d. **Non-Compliant.** There is no logic to the proposed project achieving any of the requirements of this Commercial Zone 1 requirements.
8. Section 6.3: Incorrectly states that this site is not subject to the Special Building Overlay.
 - d. **Non-Compliant.** All Land data states clearly that this site is subject to DCPO - Development Contributions Plan Overlay - Schedule 2, DPO - Development Plan Overlay - Schedule 2, **SBO - Special Building Overlay.** Significant oversight on the planning report.
9. Section 6.5: Car parking assessment has been poorly conducted as previously stated throughout this correspondence.
10. Section 7.1: Brimbank Planning Policy Framework assessments: There is no assessment of the Keilor Downs Urban Design Framework document.
 - d. **This appears to be a significant oversight.**
11. Section 7.2: Land use. The statements here are inconsistent with the Commercial Zone 1 framework as previously explained in General Concerns 6. The large scale of proposed density may be appropriate for the proximity to the shopping area, but it is not consistent with a smooth transition between the low density dwellings immediately adjacent to the area.
 - d. **This appears to be a significant oversight.**
12. Section 7.8: As previously stated throughout this Correspondence, the stated allocation of parking is inconsistent and appears to be poorly calculated. This will undoubtedly result in additional parking outflows into the general residential area.
13. General: Of the Town Planning Report, there is a significant non-compliance that has been observed. From Clause 52.20-04: Consultation requirements Before the use or development commences: Public consultation, and consultation with the relevant municipal council, must be undertaken. A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to must be prepared to the satisfaction of the responsible authority

- d. **Non-Compliant.** Public information sharing appears to have been poorly conducted, with sharing of relevant data and planning information to the community of keilor downs being assessed as significantly inappropriate. There has been little effort to share information with only a 150m radius of residential sites being advised of such a large build with implications to the wider community being ignored. The majority of the community has only been able to find the relevant information via the physical standing advice board at the site. Noting the impacts of COVID-19 and the relevant restrictions, this can only be reviewed as poorly considered and completely void of community impact assessment.

Transport Impact Assessment Concerns:

Parking assessments and driving assessments from the annexes of the document (by Onemilegrid). These parking diagrams show a barely achievable parking assessment, additionally is of note the 'impact' to the internal garage space with each vehicle diagram showing that the standard vehicle diagrams cannot fit within the garage. This is not consistent or appropriate with a reasonable assessment of parking conditions. Entry has not been considered. The presented turning radii do not appear to be achievable (specifically the 'red' vehicle in the diagram at Figure 1)

- d. **This is inappropriate and inconsiderate, additionally it can be considered unsafe.**

Figure 1 - Extract from Baptcare Public Reports



Conclusion:

In accordance with the exhaustive list of non-compliant, inappropriate and inconsistent statements in the provided reports, supported by the list of general concerns and poor circulation of information relating to the project providing clear non-compliance to sections required to get to this stage of planning as follows:

- 13. 52.20-1
- 14. 52.20-3
- 15. 52.20-4
- 16. 52.20-6.4

We request cancellation of this proposal and that reconsideration of the future planning in the area is conducted in a manner which is commensurate to and supportive of the local community needs. All reconsideration must be achieved through community input and via the required council planning solutions established in the Brimbank area.

88. Re: Baptistcare development of 21A Copernicus Way, Keilor Downs

We (read: the respondents identified at Annex A of this document) are writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Baptistcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. We live in Keilor Downs, many with young families and many who have been residents

of Brimbank for over 20 years. Of this community there are those in various areas of employment, including professionals in the Health and Community Services sector with extensive experience and support the awareness of the needs of communities that the project would target.

There are several key planning issues with the proposal we request consideration of and accordingly an appropriate response to. Additionally supported by an exhaustive list on non-compliant and poorly considered planning solutions identified at Annex B of this document.

Lack of Community Consultation and Culturally inclusive practice.

We were informed about this proposal recently from our neighbours who live within 150 metres of the proposed construction, or via viewing of the obscurely located planning advice sign. Subsequently, a community consultation meeting about the proposal was conducted by Bapcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project (estimated at no more than 15 residents), as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area which isn't often frequented by foot and is not accessible by car, and is additionally over 150m from the construction location. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents and is also non-compliant to Clause 52.20 of which this development's proposal is based upon.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English, and additionally, no alternative language service is available to understand the planning information. Some residents were able to attend the recent consultation meeting with Bapcare via Zoom, however measures were not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project whom are not familiar with technology services. It was evident from the meeting that this demographic was not present, and their voice continues to not have been heard.

In addition to this, there has been no consideration of the COVID-19 restrictions that are placed on the communities in Melbourne and the subsequent difficulty in access to information relating to this development; being that the only publicly available information is the obscurely positioned sign. This is further evidenced by the community itself forming this document, of its own volition, with almost all residents being made aware via word of mouth.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above. To date, this information remains unavailable, unclear and unverified of fact.

We understand that Baptcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Baptcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Baptcare have changed their plan of building a retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected. This is further supported by the significant lack of community consultation.

Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Baptcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

We direct you to Annex A and Annex B of this document for the persons who oppose this development and further evidence of the non-compliance to Clause 52.20.

Annex A - Individuals who oppose this development

Please find at the following link over 1000 local residents who are opposed to this development. Each of these individuals is to be considered as a formal respondent to this objection and as such included in Baptcare's formal review paper than is supplied to the State Government or its Representatives in accordance with Clause 52.20 (Department of Health and Human Services or the Director of Housing)

Current petition for rejection: https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilor-downs?fbclid=IwAR10U3M1B4S21a_Z1SfZUc2lq1zQYOYb1U3GuFPIfU0q0-Zw3V0P-Zmswiw

Annex B - Technical Assessment of Baptistcare's Planning Reports

This assessment is generated from the following publically available reports:

<https://www.baptcare.org.au/services/housing/affordable-housing>

General Concerns:

1. This development is for 47 dwelling of unknown inhabitant numbers, however, it can be assumed that approximately 150 people will occupy this area. Given the significant numbers of inhabitants and dwellings being built, it is inappropriate that the distribution of advice relating to this build was only provided to a 150m radius of the build location. [REDACTED]. There will be significant impact to the surrounding area, including schools, public facilities (parks etc), community facilities (gyms/pools), retail and shopping facilities, of which the Keilor Downs community regularly utilise. The majority of the user community will remain unaware of this development. [REDACTED]
 - e. This is inappropriate and requested to be addressed.
2. Given the type of dwellings and number, this will no doubt have a significant impact on the house values within a far greater radius than 150m. Initial assessments would indicate the impact to be to no less than 3km surrounding the development. This has not been addressed in the reports and consideration has not been provided to this effect.
 - e. This is inappropriate and must be addressed for the impacted community.
3. The general Social Housing policy of 'One in Nine' is a method of disbursing social housing tenants throughout the community. This is in recognition of best practice australia wide, being that people experiencing disadvantage are far more likely to move along the housing continuum and out of disadvantage when they are part of a socially diverse community: rather than collate the disadvantaged community together in a complex that, over time, will only erode and decay into another block of social housing 'flats' like those already existing around areas of Melbourne. Additionally, the City's own policy, requires any development not subject future occupants to undesirable levels of disturbance and/or nuisance.
4. In addition to para 3. This development will house disadvantaged individuals in a single location further putting pressure on community well being.
 - e. This is non-compliant with Clause 21.03-1.
5. Given the impact of social housing on local emergency services, and the significant number of new dwellings being built, there has been no review or consideration on the demand for local emergency services.

- e. This is a significant oversight.
- 6. The location of the development is in a Commercial Zone 1.
 - e. **This is non-compliant** inconsistent with the normal General Residential or Residential Growth Zone requirements to produce high density dwellings (ref Clause 21.02)

Town Planning Report Concerns:

1. The development of 47 dwellings and estimated 150 inhabitants is likely to result in no less than approximately 60 cars (based on unit distributions). A single car park appears to be poorly assessed, despite it passing Clause 52.20 basic requirements.
2. The planning report notes that this project is developed adjacent to a proposed aged care facility (future). This appears to be inconsistent and provides no assessment of the future transport requirements for the land parcel.
3. Clause 15.01-2S: Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.
 - e. **Non-compliant.** Property values will be significantly impacted. The proposed dwellings are inconsistent with all properties in the local area (proposed are high density - existing are not high density). incomplete consideration of parking requirements (only 47 spaces provided, well below assessed inhabitant requirements).
4. Clause 15.01-5S: Pattern of local urban structure and subdivision. Heritage values and built form that reflect community identity.
 - e. **Non-compliant.** There has been no consideration of the local housing representation which have existed for over 50 years. The new development is inconsistent in size/look/feel of the entire suburb.
5. Clause 21.02-3: Apply the Commercial 1 Zone to facilitate retail uses and mixed use development consistent with the primary purpose of the zone.
 - e. **Non-compliant.** This development is only residential in purpose. There is zero foreseeable consideration for this clause in the development. It has not been addressed.
6. Clause 21.04: Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.
 - e. **Non-compliant.** The significance of moving from large parcel property of single dwellings immediately to high density dwellings is inconsistent.
7. Section 6.1: These statements are inconsistent with the requirements of Commercial Zone 1 and do not appear to be logical. Further detail and a re-write of the presented statements is essential.
 - e. **Non-Compliant.** There is no logic to the proposed project achieving any of the requirements of this Commercial Zone 1 requirements.
8. Section 6.3: Incorrectly states that this site is not subject to the Special Building Overlay.

- e. **Non-Compliant.** All Land data states clearly that this site is subject to DCPO - Development Contributions Plan Overlay - Schedule 2, DPO - Development Plan Overlay - Schedule 2, **SBO - Special Building Overlay**. Significant oversight on the planning report.
- 9. Section 6.5: Car parking assessment has been poorly conducted as previously stated throughout this correspondence.
- 10. Section 7.1: Brimbank Planning Policy Framework assessments: There is no assessment of the Keilor Downs Urban Design Framework document.
 - e. **This appears to be a significant oversight.**
- 11. Section 7.2: Land use. The statements here are inconsistent with the Commercial Zone 1 framework as previously explained in General Concerns 6. The large scale of proposed density may be appropriate for the proximity to the shopping area, but it is not consistent with a smooth transition between the low density dwellings immediately adjacent to the area.
 - e. **This appears to be a significant oversight.**
- 12. Section 7.8: As previously stated throughout this Correspondence, the stated allocation of parking is inconsistent and appears to be poorly calculated. This will undoubtedly result in additional parking outflows into the general residential area.
- 13. General: Of the Town Planning Report, there is a significant non-compliance that has been observed. From Clause 52.20-04: **Consultation requirements** Before the use or development commences: Public consultation, and consultation with the relevant municipal council, must be undertaken. A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to must be prepared to the satisfaction of the responsible authority
 - e. **Non-Compliant.** Public information sharing appears to have been poorly conducted, with sharing of relevant data and planning information to the community of Keilor Downs being assessed as significantly inappropriate. There has been little effort to share information with only a 150m radius of residential sites being advised of such a large build with implications to the wider community being ignored. The majority of the community has only been able to find the relevant information via the physical standing advice board at the site. Noting the impacts of COVID-19 and the relevant restrictions, this can only be reviewed as poorly considered and completely void of community impact assessment.

Transport Impact Assessment Concerns:

Parking assessments and driving assessments from the annexes of the document (by Onemilegrid). These parking diagrams show a barely achievable parking assessment, additionally is of note the 'impact' to the internal garage space with each vehicle diagram showing that the standard vehicle diagrams cannot fit within the garage. This is not consistent or appropriate with a reasonable assessment of parking conditions. Entry has not been considered. The presented turning radii do not appear to be achievable (specifically the 'red' vehicle in the diagram at Figure 1)

- e. **This is inappropriate and inconsiderate, additionally it can be considered unsafe.**

Figure 1 - Extract from Baptcare Public Reports



Conclusion:

In accordance with the exhaustive list of non-compliant, inappropriate and inconsistent statements in the provided reports, supported by the list of general concerns and poor circulation of information relating to the project providing clear non-compliance to sections required to get to this stage of planning as follows:

- 17. 52.20-1
- 18. 52.20-3
- 19. 52.20-4
- 20. 52.20-6.4

We request cancellation of this proposal and that reconsideration of the future planning in the area is conducted in a manner which is commensurate to and supportive of the local community needs. All reconsideration must be achieved through community input and via the required council planning solutions established in the Brimbank area.

Re: Bapcare development of 21A Copernicus Way, Keilor Downs

We (read: the respondents identified at Annex A of this document) are writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Bapcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. We live in Keilor Downs, many with young families and many who have been residents of Brimbank for over 20 years. Of this community there are those in various areas of employment, including professionals in the Health and Community Services sector with extensive experience and support the awareness of the needs of communities that the project would target.

There are several key planning issues with the proposal we request consideration of and accordingly an appropriate response to, additionally supported by an exhaustive list on non-compliant and poorly considered planning solutions identified at Annex B of this document.

Lack of Community Consultation and Culturally inclusive practice.

We were informed about this proposal recently from our neighbours who live within 150 metres of the proposed construction, or via viewing of the obscurely located planning advice sign. Subsequently, a community consultation meeting about the proposal was conducted by Bapcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project (estimated at no more than 15 residents), as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area which isn't often frequented by foot and is not accessible by car, and is additionally over 150m from the construction location. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents and is also non-compliant to Clause 52.20 of which this development's proposal is based upon.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English, and additionally, no alternative language service is available to understand the planning information. Some residents were able to attend the recent consultation meeting with Bapcare via Zoom, however measures were not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project whom are not familiar with technology services. It was evident from the meeting that this demographic was not present, and their voice continues to not have been heard.

In addition to this, there has been no consideration of the COVID-19 restrictions that are placed on the communities in Melbourne and the subsequent difficulty in access to information relating to this development; being that the only publicly available information is the obscurely positioned sign. This is further evidenced by the community itself forming this document, of it's own volition, with almost all residents being made aware via word of mouth.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above. To date, this information remains unavailable, unclear and unverified of fact.

We understand that Baptcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Baptcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Baptcare have changed their plan of building a

retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected. This is further supported by the significant lack of community consultation.

Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Baptcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

We direct you to Annex A and Annex B of this document for the persons who oppose this development and further evidence of the non-compliance to Clause 52.20.

Annex A - Individuals who oppose this development

Please find at the following link over 1000 local residents who are opposed to this development. Each of these individuals is to be considered as a formal respondent to this objection and as such included in Baptcare's formal review paper than is supplied to the

State Government or its Representatives in accordance with Clause 52.20 (Department of Health and Human Services or the Director of Housing)

Current petition for rejection: https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-kellor-downs?fbclid=IwAR10U3M1B4S21a_Z1SfZUc2lq1zQYOYb1U3GuFPiU0q0-Zw3V0P-Zmswiw

Annex B - Technical Assessment of Baptcare's Planning Reports

This assessment is generated from the following publically available reports:

<https://www.baptcare.org.au/services/housing/affordable-housing>

General Concerns:

1. This development is for 47 dwelling of unknown inhabitant numbers, however, it can be assumed that approximately 150 people will occupy this area. Given the significant numbers of inhabitants and dwellings being built, it is inappropriate that the distribution of advice relating to this build was only provided to a 150m radius of the build location. [REDACTED]
[REDACTED] There will be significant impact to the surrounding area, including schools, public facilities (parks etc), community facilities (gyms/pools), retail and shopping facilities, of which the Keilor Downs community regularly utilise. The majority of the user community will remain unaware of this development. [REDACTED]
[REDACTED]
 - f. This is inappropriate and requested to be addressed.
2. Given the type of dwellings and number, this will no doubt have a significant impact on the house values within a far greater radius than 150m. Initial assessments would indicate the impact to be to no less than 3km surrounding the development. This has not been addressed in the reports and consideration has not been provided to this effect.
 - f. This is inappropriate and must be addressed for the impacted community.
3. The general Social Housing policy of 'One in Nine' is a method of disbursing social housing tenants throughout the community. This is in recognition of best practice australia wide, being that people experiencing disadvantage are far more likely to move along the housing continuum and out of disadvantage when they are part of a socially diverse community: rather than collate the disadvantaged community together in a complex that, over time, will only erode and decay into

- another block of social housing 'flats' like those already existing around areas of Melbourne. Additionally, the City's own policy, requires any development not subject future occupants to undesirable levels of disturbance and/or nuisance.
4. In addition to para 3. This development will house disadvantaged individuals in a single location further putting pressure on community well being.
 - f. **This is non-compliant** with Clause 21.03-1.
 5. Given the impact of social housing on local emergency services, and the significant number of new dwellings being built, there has been no review or consideration on the demand for local emergency services.
 - f. **This is a significant oversight.**
 6. The location of the development is in a Commercial Zone 1.
 - f. **This is non-compliant** inconsistent with the normal General Residential or Residential Growth Zone requirements to produce high density dwellings (ref Clause 21.02)

Town Planning Report Concerns:

1. The development of 47 dwellings and estimated 150 inhabitants is likely to result in no less than approximately 60 cars (based on unit distributions). A single car park appears to be poorly assessed, despite it passing Clause 52.20 basic requirements.
2. The planning report notes that this project is developed adjacent to a proposed aged care facility (future). This appears to be inconsistent and provides no assessment of the future transport requirements for the land parcel.
3. Clause 15.01-2S: Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.
 - f. **Non-compliant.** Property values will be significantly impacted. The proposed dwellings are inconsistent with all properties in the local area (proposed are high density - existing are not high density), incomplete consideration of parking requirements (only 47 spaces provided, well below assessed inhabitant requirements).
4. Clause 15.01-5S: Pattern of local urban structure and subdivision. Heritage values and built form that reflect community identity.
 - f. **Non-compliant.** There has been no consideration of the local housing representation which have existed for over 50 years. The new development is inconsistent in size/look/feel of the entire suburb.
5. Clause 21.02-3: Apply the Commercial 1 Zone to facilitate retail uses and mixed use development consistent with the primary purpose of the zone.
 - f. **Non-compliant.** This development is only residential in purpose. There is zero foreseeable consideration for this clause in the development. It has not been addressed.
6. Clause 21.04: Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.

- f. **Non-compliant.** The significance of moving from large parcel property of single dwellings immediately to high density dwellings is inconsistent.
- 7. Section 6.1: These statements are inconsistent with the requirements of Commercial Zone 1 and do not appear to be logical. Further detail and a re-write of the presented statements is essential.
 - f. **Non-Compliant.** There is no logic to the proposed project achieving any of the requirements of this Commercial Zone 1 requirements.
- 8. Section 6.3: Incorrectly states that this site is not subject to the Special Building Overlay.
 - f. **Non-Compliant.** All Land data states clearly that this site is subject to DCPO - Development Contributions Plan Overlay - Schedule 2, DPO - Development Plan Overlay - Schedule 2, **SBO - Special Building Overlay**. Significant oversight on the planning report.
- 9. Section 6.5: Car parking assessment has been poorly conducted as previously stated throughout this correspondence.
- 10. Section 7.1: Brimbank Planning Policy Framework assessments: There is no assessment of the Keilor Downs Urban Design Framework document.
 - f. **This appears to be a significant oversight.**
- 11. Section 7.2: Land use. The statements here are inconsistent with the Commercial Zone 1 framework as previously explained in General Concerns 6. The large scale of proposed density may be appropriate for the proximity to the shopping area, but it is not consistent with a smooth transition between the low density dwellings immediately adjacent to the area.
 - f. **This appears to be a significant oversight.**
- 12. Section 7.8: As previously stated throughout this Correspondence, the stated allocation of parking is inconsistent and appears to be poorly calculated. This will undoubtedly result in additional parking outflows into the general residential area.
- 13. General: Of the Town Planning Report, there is a significant non-compliance that has been observed. From Clause 52.20-04: Consultation requirements Before the use or development commences: Public consultation, and consultation with the relevant municipal council, must be undertaken. A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to must be prepared to the satisfaction of the responsible authority
 - f. **Non-Compliant.** Public information sharing appears to have been poorly conducted, with sharing of relevant data and planning information to the community of keilor downs being assessed as significantly inappropriate. There has been little effort to share information with only a 150m radius of residential sites being advised of such a large build with implications to the wider community being ignored. The majority of the community has only been able to find the relevant information via the physical standing advice board at the site. Noting the impacts of COVID-19 and the relevant restrictions, this can only be reviewed as poorly considered and completely void of community impact assessment.

Transport Impact Assessment Concerns:

Parking assessments and driving assessments from the annexes of the document (by Onemilegrid). These parking diagrams show a barely achievable parking assessment, additionally is of note the 'impact' to the internal garage space with each vehicle diagram showing that the standard vehicle diagrams cannot fit within the garage. This is not consistent or appropriate with a reasonable assessment of parking conditions. Entry has not been considered. The presented turning radii do not appear to be achievable (specifically the 'red' vehicle in the diagram at Figure 1)

f. **This is inappropriate and inconsiderate, additionally it can be considered unsafe.**

Figure 1 - Extract from Baptcare Public Reports



Conclusion:

In accordance with the exhaustive list of non-compliant, inappropriate and inconsistent statements in the provided reports, supported by the list of general concerns and poor circulation of information relating to the project providing clear non-compliance to sections required to get to this stage of planning as follows:

- 21. 52.20-1
- 22. 52.20-3
- 23. 52.20-4

24. 52.20-6.4

We request cancellation of this proposal and that reconsideration of the future planning in the area is conducted in a manner which is commensurate to and supportive of the local community needs. All reconsideration must be achieved through community input and via the required council planning solutions established in the Brimbank area.

90. **Re: Baptcare development of 21A Copernicus Way, Keilor Downs**

We (read: the respondents identified at Annex A of this document) are writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Baptcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. We live in Keilor Downs, many with young families and many who have been residents of Brimbank for over 20 years. Of this community there are those in various areas of employment, including professionals in the Health and Community Services sector with extensive experience and support the awareness of the needs of communities that the project would target.

There are several key planning issues with the proposal we request consideration of and accordingly an appropriate response to. additionally supported by an exhaustive list on non-compliant and poorly considered planning solutions identified at Annex B of this document.

Lack of Community Consultation and Culturally inclusive practice.

We were informed about this proposal recently from our neighbours who live within 150 metres of the proposed construction, or via viewing of the obscurely located planning advice sign. Subsequently, a community consultation meeting about the proposal was conducted by Baptcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project (estimated at no more than 15 residents), as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area which isn't often frequented by foot and is not accessible by car, and is additionally over 150m from the construction location. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents and is also non-compliant to Clause 52.20 of which this development's proposal is based upon.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the

aforementioned flyer was not distributed in other languages apart from English, and additionally, no alternative language service is available to understand the planning information. Some residents were able to attend the recent consultation meeting with Baptcare via Zoom, however measures were not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project whom are not familiar with technology services. It was evident from the meeting that this demographic was not present, and their voice continues to not have been heard.

In addition to this, there has been no consideration of the COVID-19 restrictions that are placed on the communities in Melbourne and the subsequent difficulty in access to information relating to this development; being that the only publicly available information is the obscurely positioned sign. This is further evidenced by the community itself forming this document, of it's own volition, with almost all residents being made aware via word of mouth.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most

residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above. To date, this information remains unavailable, unclear and unverified of fact.

We understand that Bapcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Bapcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Bapcare have changed their plan of building a retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected. This is further supported by the significant lack of community consultation.

Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Bapcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

We direct you to Annex A and Annex B of this document for the persons who oppose this development and further evidence of the non-compliance to Clause 52.20.

Annex A - Individuals who oppose this development

Please find at the following link over 1000 local residents who are opposed to this development. Each of these individuals is to be considered as a formal respondent to this objection and as such included in Baptcare's formal review paper than is supplied to the State Government or its Representatives in accordance with Clause 52.20 (Department of Health and Human Services or the Director of Housing)

Current petition for rejection: https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilor-downs?fbclid=IwAR10U3M1B4S21a_Z1SfZUc2q1zQYOYb1U3GuFPIfU0g0-Zw3V0P-Zmswiw

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Annex B - Technical Assessment of Baptcare's Planning Reports

This assessment is generated from the following publically available reports:
<https://www.baptcare.org.au/services/housing/affordable-housing>

General Concerns:

1. This development is for 47 dwelling of unknown inhabitant numbers, however, it can be assumed that approximately 150 people will occupy this area. Given the significant numbers of inhabitants and dwellings being built, it is inappropriate that the distribution of advice relating to this build was only provided to a 150m radius of the build location. [REDACTED]. There will be significant impact to the surrounding area, including schools, public facilities (parks etc), community facilities (gyms/pools), retail and shopping facilities, of which the Keilor Downs community regularly utilise. The majority of the user community will remain unaware of this development. [REDACTED]

g. This is inappropriate and requested to be addressed.

2. Given the type of dwellings and number, this will no doubt have a significant impact on the house values within a far greater radius than 150m. Initial assessments would indicate the impact to be to no less than 3km surrounding the development. This has not been addressed in the reports and consideration has not been provided to this effect.
 - g. **This is inappropriate and must be addressed for the impacted community.**
3. The general Social Housing policy of 'One in Nine' is a method of disbursing social housing tenants throughout the community. This is in recognition of best practice australia wide, being that people experiencing disadvantage are far more likely to move along the housing continuum and out of disadvantage when they are part of a socially diverse community: rather than collate the disadvantaged community together in a complex that, over time, will only erode and decay into another block of social housing 'flats' like those already existing around areas of Melbourne. Additionally, the City's own policy, requires any development not subject future occupants to undesirable levels of disturbance and/or nuisance.
4. In addition to para 3. This development will house disadvantaged individuals in a single location further putting pressure on community well being.
 - g. **This is non-compliant** with Clause 21.03-1.
5. Given the impact of social housing on local emergency services, and the significant number of new dwellings being built, there has been no review or consideration on the demand for local emergency services.
 - g. This is a significant oversight.
6. The location of the development is in a Commercial Zone 1.
 - g. **This is non-compliant** inconsistent with the normal General Residential or Residential Growth Zone requirements to produce high density dwellings (ref Clause 21.02)

Town Planning Report Concerns:

1. The development of 47 dwellings and estimated 150 inhabitants is likely to result in no less than approximately 60 cars (based on unit distributions). A single car park appears to be poorly assessed, despite it passing Clause 52.20 basic requirements.
2. The planning report notes that this project is developed adjacent to a proposed aged care facility (future). This appears to be inconsistent and provides no assessment of the future transport requirements for the land parcel.
3. Clause 15.01-2S: Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.
 - g. **Non-compliant.** Property values will be significantly impacted. The proposed dwellings are inconsistent with all properties in the local area (proposed are high density - existing are not high density). incomplete consideration of parking requirements (only 47 spaces provided, well below assessed inhabitant requirements).
4. Clause 15.01-5S: Pattern of local urban structure and subdivision. Heritage values and built form that reflect community identity.
 - g. **Non-compliant.** There has been no consideration of the local housing representation which have existed for over 50 years. The new development is inconsistent in size/look/feel of the entire suburb.

5. Clause 21.02-3: Apply the Commercial 1 Zone to facilitate retail uses and mixed use development consistent with the primary purpose of the zone.
 - g. **Non-compliant.** This development is only residential in purpose. There is zero foreseeable consideration for this clause in the development. It has not been addressed.
6. Clause 21.04: Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.
 - g. **Non-compliant.** The significance of moving from large parcel property of single dwellings immediately to high density dwellings is inconsistent.
7. Section 6.1: These statements are inconsistent with the requirements of Commercial Zone 1 and do not appear to be logical. Further detail and a re-write of the presented statements is essential.
 - g. **Non-Compliant.** There is no logic to the proposed project achieving any of the requirements of this Commercial Zone 1 requirements.
8. Section 6.3: Incorrectly states that this site is not subject to the Special Building Overlay.
 - g. **Non-Compliant.** All Land data states clearly that this site is subject to DCPO - Development Contributions Plan Overlay - Schedule 2, DPO - Development Plan Overlay - Schedule 2, **SBO - Special Building Overlay.** Significant oversight on the planning report.
9. Section 6.5: Car parking assessment has been poorly conducted as previously stated throughout this correspondence.
10. Section 7.1: Brimbank Planning Policy Framework assessments: There is no assessment of the Keilor Downs Urban Design Framework document.
 - g. **This appears to be a significant oversight.**
11. Section 7.2: Land use. The statements here are inconsistent with the Commercial Zone 1 framework as previously explained in General Concerns 6. The large scale of proposed density may be appropriate for the proximity to the shopping area, but it is not consistent with a smooth transition between the low density dwellings immediately adjacent to the area.
 - g. **This appears to be a significant oversight.**
12. Section 7.8: As previously stated throughout this Correspondence, the stated allocation of parking is inconsistent and appears to be poorly calculated. This will undoubtedly result in additional parking outflows into the general residential area.
13. General: Of the Town Planning Report, there is a significant non-compliance that has been observed. From Clause 52.20-04: Consultation requirements Before the use or development commences: Public consultation, and consultation with the relevant municipal council, must be undertaken. A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to must be prepared to the satisfaction of the responsible authority
 - g. **Non-Compliant.** Public information sharing appears to have been poorly conducted, with sharing of relevant data and planning information to the community of keilor downs being assessed as significantly inappropriate. There has been little effort to share information with only a 150m radius of residential sites being advised of such a large build with implications to the wider community being ignored. The majority of the community has only been able to find the relevant information via the physical standing advice board at the site. Noting the impacts of COVID-19 and the

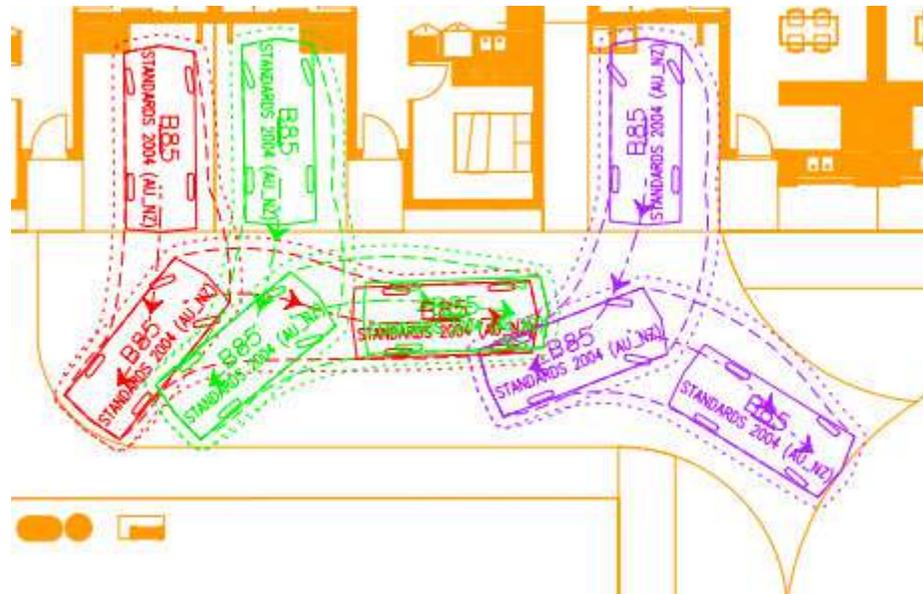
relevant restrictions, this can only be reviewed as poorly considered and completely void of community impact assessment.

Transport Impact Assessment Concerns:

Parking assessments and driving assessments from the annexes of the document (by Onemilegrid). These parking diagrams show a barely achievable parking assessment, additionally is of note the 'impact' to the internal garage space with each vehicle diagram showing that the standard vehicle diagrams cannot fit within the garage. This is not consistent or appropriate with a reasonable assessment of parking conditions. Entry has not been considered. The presented turning radii do not appear to be achievable (specifically the 'red' vehicle in the diagram at Figure 1)

- g. **This is inappropriate and inconsiderate, additionally it can be considered unsafe.**

Figure 1 - Extract from Baptcare Public Reports



Conclusion:

In accordance with the exhaustive list of non-compliant, inappropriate and inconsistent statements in the provided reports, supported by the list of general concerns and poor circulation of information relating to the project providing clear non-compliance to sections required to get to this stage of planning as follows:

25. 52.20-1
26. 52.20-3
27. 52.20-4
28. 52.20-6.4

We request cancellation of this proposal and that reconsideration of the future planning in the area is conducted in a manner which is commensurate to and supportive of the local community needs. All reconsideration must be achieved through community input and via the required council planning solutions established in the Brimbank area.

91. **Re: Baptistcare development of 21A Copernicus Way, Keilor Downs**

We (read: the respondents identified at Annex A of this document) are writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Baptistcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. We live in Keilor Downs, many with young families and many who have been residents of Brimbank for over 20 years. Of this community there are those in various areas of employment, including professionals in the Health and Community Services sector with extensive experience and support the awareness of the needs of communities that the project would target.

There are several key planning issues with the proposal we request consideration of and accordingly an appropriate response to. additionally supported by an exhaustive list on non-compliant and poorly considered planning solutions identified at Annex B of this document.

Lack of Community Consultation and Culturally inclusive practice.

We were informed about this proposal recently from our neighbours who live within 150 metres of the proposed construction, or via viewing of the obscurely located planning advice sign. Subsequently, a community consultation meeting about the proposal was conducted by Baptistcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project (estimated at no more than 15 residents), as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage

has been hidden away in an area which isn't often frequented by foot and is not accessible by car, and is additionally over 150m from the construction location. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents and is also non-compliant to Clause 52.20 of which this development's proposal is based upon.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English, and additionally, no alternative language service is available to understand the planning information. Some residents were able to attend the recent consultation meeting with Baptcare via Zoom, however measures were not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project whom are not familiar with technology services. It was evident from the meeting that this demographic was not present, and their voice continues to not have been heard.

In addition to this, there has been no consideration of the COVID-19 restrictions that are placed on the communities in Melbourne and the subsequent difficulty in access to information relating to this development; being that the only publicly available information is the obscurely positioned sign. This is further evidenced by the community itself forming this document, of it's own volition, with almost all residents being made aware via word of mouth.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the

government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above. To date, this information remains unavailable, unclear and unverified of fact.

We understand that Baptcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Baptcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Baptcare have changed their plan of building a retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected. This is further supported by the significant lack of community consultation.

Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Baptcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched

community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

We direct you to Annex A and Annex B of this document for the persons who oppose this development and further evidence of the non-compliance to Clause 52.20.

Annex A - Individuals who oppose this development

Please find at the following link over 1000 local residents who are opposed to this development. Each of these individuals is to be considered as a formal respondent to this objection and as such included in Baptistcare's formal review paper than is supplied to the State Government or its Representatives in accordance with Clause 52.20 (Department of Health and Human Services or the Director of Housing)

Current petition for rejection: https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilor-downs?fbclid=IwAR10U3M1B4S21a_Z1SfZUc2lq1zQYOYb1U3GuFPIfU0q0-Zw3V0P-Zmswiw

Annex B - Technical Assessment of Baptistcare's Planning Reports

This assessment is generated from the following publically available reports:

<https://www.baptcare.org.au/services/housing/affordable-housing>

General Concerns:

1. This development is for 47 dwelling of unknown inhabitant numbers, however, it can be assumed that approximately 150 people will occupy this area. Given the significant numbers of inhabitants and dwellings being built, it is inappropriate that the distribution of advice relating to this build was only provided to a 150m radius of the build location. [REDACTED]. There will be significant impact to the surrounding area, including schools, public facilities (parks etc), community facilities (gyms/pools), retail and shopping facilities, of which the Keilor Downs community regularly utilise. The majority of the user community will remain unaware of this development. [REDACTED]

- h. **This is inappropriate and requested to be addressed.**
2. Given the type of dwellings and number, this will no doubt have a significant impact on the house values within a far greater radius than 150m. Initial assessments would indicate the impact to be to no less than 3km surrounding the development. This has not been addressed in the reports and consideration has not been provided to this effect.
- h. **This is inappropriate and must be addressed for the impacted community.**
3. The general Social Housing policy of 'One in Nine' is a method of disbursing social housing tenants throughout the community. This is in recognition of best practice australia wide, being that people experiencing disadvantage are far more likely to move along the housing continuum and out of disadvantage when they are part of a socially diverse community; rather than collate the disadvantaged community together in a complex that, over time, will only erode and decay into another block of social housing 'flats' like those already existing around areas of Melbourne. Additionally, the City's own policy, requires any development not subject future occupants to undesirable levels of disturbance and/or nuisance.
4. In addition to para 3. This development will house disadvantaged individuals in a single location further putting pressure on community well being.
- h. **This is non-compliant** with Clause 21.03-1.
5. Given the impact of social housing on local emergency services, and the significant number of new dwellings being built, there has been no review or consideration on the demand for local emergency services.
- h. **This is a significant oversight.**
6. The location of the development is in a Commercial Zone 1.
- h. **This is non-compliant** inconsistent with the normal General Residential or Residential Growth Zone requirements to produce high density dwellings (ref Clause 21.02)

Town Planning Report Concerns:

1. The development of 47 dwellings and estimated 150 inhabitants is likely to result in no less than approximately 60 cars (based on unit distributions). A single car park appears to be poorly assessed, despite it passing Clause 52.20 basic requirements.
2. The planning report notes that this project is developed adjacent to a proposed aged care facility (future). This appears to be inconsistent and provides no assessment of the future transport requirements for the land parcel.
3. Clause 15.01-2S: Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.
 - h. **Non-compliant.** Property values will be significantly impacted. The proposed dwellings are inconsistent with all properties in the local area (proposed are high density - existing are not high density), incomplete consideration of parking requirements (only 47 spaces provided, well below assessed inhabitant requirements).

4. Clause 15.01-5S: Pattern of local urban structure and subdivision. Heritage values and built form that reflect community identity.
 - h. **Non-compliant.** There has been no consideration of the local housing representation which have existed for over 50 years. The new development is inconsistent in size/look/feel of the entire suburb.
5. Clause 21.02-3: Apply the Commercial 1 Zone to facilitate retail uses and mixed use development consistent with the primary purpose of the zone.
 - h. **Non-compliant.** This development is only residential in purpose. There is zero foreseeable consideration for this clause in the development. It has not been addressed.
6. Clause 21.04: Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.
 - h. **Non-compliant.** The significance of moving from large parcel property of single dwellings immediately to high density dwellings is inconsistent.
7. Section 6.1: These statements are inconsistent with the requirements of Commercial Zone 1 and do not appear to be logical. Further detail and a re-write of the presented statements is essential.
 - h. **Non-Compliant.** There is no logic to the proposed project achieving any of the requirements of this Commercial Zone 1 requirements.
8. Section 6.3: Incorrectly states that this site is not subject to the Special Building Overlay.
 - h. **Non-Compliant.** All Land data states clearly that this site is subject to DCPO - Development Contributions Plan Overlay - Schedule 2, DPO - Development Plan Overlay - Schedule 2, **SBO - Special Building Overlay.** Significant oversight on the planning report.
9. Section 6.5: Car parking assessment has been poorly conducted as previously stated throughout this correspondence.
10. Section 7.1: Brimbank Planning Policy Framework assessments: There is no assessment of the Keilor Downs Urban Design Framework document.
 - h. **This appears to be a significant oversight.**
11. Section 7.2: Land use. The statements here are inconsistent with the Commercial Zone 1 framework as previously explained in General Concerns 6. The large scale of proposed density may be appropriate for the proximity to the shopping area, but it is not consistent with a smooth transition between the low density dwellings immediately adjacent to the area.
 - h. **This appears to be a significant oversight.**
12. Section 7.8: As previously stated throughout this Correspondence, the stated allocation of parking is inconsistent and appears to be poorly calculated. This will undoubtedly result in additional parking outflows into the general residential area.
13. General: Of the Town Planning Report, there is a significant non-compliance that has been observed. From Clause 52.20-04: Consultation requirements Before the use or development commences: Public consultation, and consultation with the relevant municipal council, must be undertaken. A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to must be prepared to the satisfaction of the responsible authority

- h. **Non-Compliant.** Public information sharing appears to have been poorly conducted, with sharing of relevant data and planning information to the community of keilor downs being assessed as significantly inappropriate. There has been little effort to share information with only a 150m radius of residential sites being advised of such a large build with implications to the wider community being ignored. The majority of the community has only been able to find the relevant information via the physical standing advice board at the site. Noting the impacts of COVID-19 and the relevant restrictions, this can only be reviewed as poorly considered and completely void of community impact assessment.

Transport Impact Assessment Concerns:

Parking assessments and driving assessments from the annexes of the document (by Onemilegrid). These parking diagrams show a barely achievable parking assessment, additionally is of note the 'impact' to the internal garage space with each vehicle diagram showing that the standard vehicle diagrams cannot fit within the garage. This is not consistent or appropriate with a reasonable assessment of parking conditions. Entry has not been considered. The presented turning radii do not appear to be achievable (specifically the 'red' vehicle in the diagram at Figure 1)

- h. **This is inappropriate and inconsiderate, additionally it can be considered unsafe.**

Figure 1 - Extract from Baptcare Public Reports



Conclusion:

In accordance with the exhaustive list of non-compliant, inappropriate and inconsistent statements in the provided reports, supported by the list of general concerns and poor circulation of information relating to the project providing clear non-compliance to sections required to get to this stage of planning as follows:

- 29. 52.20-1
- 30. 52.20-3
- 31. 52.20-4
- 32. 52.20-6.4

We request cancellation of this proposal and that reconsideration of the future planning in the area is conducted in a manner which is commensurate to and supportive of the local community needs. All reconsideration must be achieved through community input and via the required council planning solutions established in the Brimbank area.

92. Re: Baptistcare development of 21A Copernicus Way, Keilor Downs

We (read: the respondents identified at Annex A of this document) are writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Baptistcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. We live in Keilor Downs, many with young families and many who have been residents

of Brimbank for over 20 years. Of this community there are those in various areas of employment, including professionals in the Health and Community Services sector with extensive experience and support the awareness of the needs of communities that the project would target.

There are several key planning issues with the proposal we request consideration of and accordingly an appropriate response to. Additionally supported by an exhaustive list on non-compliant and poorly considered planning solutions identified at Annex B of this document.

Lack of Community Consultation and Culturally inclusive practice.

We were informed about this proposal recently from our neighbours who live within 150 metres of the proposed construction, or via viewing of the obscurely located planning advice sign. Subsequently, a community consultation meeting about the proposal was conducted by Bapcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project (estimated at no more than 15 residents), as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area which isn't often frequented by foot and is not accessible by car, and is additionally over 150m from the construction location. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents and is also non-compliant to Clause 52.20 of which this development's proposal is based upon.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English, and additionally, no alternative language service is available to understand the planning information. Some residents were able to attend the recent consultation meeting with Bapcare via Zoom, however measures were not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project whom are not familiar with technology services. It was evident from the meeting that this demographic was not present, and their voice continues to not have been heard.

In addition to this, there has been no consideration of the COVID-19 restrictions that are placed on the communities in Melbourne and the subsequent difficulty in access to information relating to this development; being that the only publicly available information is the obscurely positioned sign. This is further evidenced by the community itself forming this document, of its own volition, with almost all residents being made aware via word of mouth.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above. To date, this information remains unavailable, unclear and unverified of fact.

We understand that Baptcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Baptcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Baptcare have changed their plan of building a retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected. This is further supported by the significant lack of community consultation.

Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Baptcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

We direct you to Annex A and Annex B of this document for the persons who oppose this development and further evidence of the non-compliance to Clause 52.20.

Annex A - Individuals who oppose this development

Please find at the following link over 1000 local residents who are opposed to this development. Each of these individuals is to be considered as a formal respondent to this objection and as such included in Baptcare's formal review paper than is supplied to the State Government or its Representatives in accordance with Clause 52.20 (Department of Health and Human Services or the Director of Housing)

Current petition for rejection: https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilor-downs?fbclid=IwAR10U3M1B4S21a_Z1SfZUc2lq1zQYOYb1U3GuFPIfU0q0-Zw3V0P-Zmswiw

Annex B - Technical Assessment of Baptistcare's Planning Reports

This assessment is generated from the following publically available reports:

<https://www.baptcare.org.au/services/housing/affordable-housing>

General Concerns:

1. This development is for 47 dwelling of unknown inhabitant numbers, however, it can be assumed that approximately 150 people will occupy this area. Given the significant numbers of inhabitants and dwellings being built, it is inappropriate that the distribution of advice relating to this build was only provided to a 150m radius of the build location. [REDACTED]. There will be significant impact to the surrounding area, including schools, public facilities (parks etc), community facilities (gyms/pools), retail and shopping facilities, of which the Keilor Downs community regularly utilise. The majority of the user community will remain unaware of this development. [REDACTED]
 - i. This is inappropriate and requested to be addressed.
2. Given the type of dwellings and number, this will no doubt have a significant impact on the house values within a far greater radius than 150m. Initial assessments would indicate the impact to be to no less than 3km surrounding the development. This has not been addressed in the reports and consideration has not been provided to this effect.
 - i. This is inappropriate and must be addressed for the impacted community.
3. The general Social Housing policy of 'One in Nine' is a method of disbursing social housing tenants throughout the community. This is in recognition of best practice australia wide, being that people experiencing disadvantage are far more likely to move along the housing continuum and out of disadvantage when they are part of a socially diverse community: rather than collate the disadvantaged community together in a complex that, over time, will only erode and decay into another block of social housing 'flats' like those already existing around areas of Melbourne. Additionally, the City's own policy, requires any development not subject future occupants to undesirable levels of disturbance and/or nuisance.
4. In addition to para 3. This development will house disadvantaged individuals in a single location further putting pressure on community well being.
 - i. This is non-compliant with Clause 21.03-1.
5. Given the impact of social housing on local emergency services, and the significant number of new dwellings being built, there has been no review or consideration on the demand for local emergency services.

- i. This is a significant oversight.
- 6. The location of the development is in a Commercial Zone 1.
 - i. **This is non-compliant** inconsistent with the normal General Residential or Residential Growth Zone requirements to produce high density dwellings (ref Clause 21.02)

Town Planning Report Concerns:

1. The development of 47 dwellings and estimated 150 inhabitants is likely to result in no less than approximately 60 cars (based on unit distributions). A single car park appears to be poorly assessed, despite it passing Clause 52.20 basic requirements.
2. The planning report notes that this project is developed adjacent to a proposed aged care facility (future). This appears to be inconsistent and provides no assessment of the future transport requirements for the land parcel.
3. Clause 15.01-2S: Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.
 - i. **Non-compliant.** Property values will be significantly impacted. The proposed dwellings are inconsistent with all properties in the local area (proposed are high density - existing are not high density). incomplete consideration of parking requirements (only 47 spaces provided, well below assessed inhabitant requirements).
4. Clause 15.01-5S: Pattern of local urban structure and subdivision. Heritage values and built form that reflect community identity.
 - i. **Non-compliant.** There has been no consideration of the local housing representation which have existed for over 50 years. The new development is inconsistent in size/look/feel of the entire suburb.
5. Clause 21.02-3: Apply the Commercial 1 Zone to facilitate retail uses and mixed use development consistent with the primary purpose of the zone.
 - i. **Non-compliant.** This development is only residential in purpose. There is zero foreseeable consideration for this clause in the development. It has not been addressed.
6. Clause 21.04: Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.
 - i. **Non-compliant.** The significance of moving from large parcel property of single dwellings immediately to high density dwellings is inconsistent.
7. Section 6.1: These statements are inconsistent with the requirements of Commercial Zone 1 and do not appear to be logical. Further detail and a re-write of the presented statements is essential.
 - i. **Non-Compliant.** There is no logic to the proposed project achieving any of the requirements of this Commercial Zone 1 requirements.
8. Section 6.3: Incorrectly states that this site is not subject to the Special Building Overlay.

- i. **Non-Compliant.** All Land data states clearly that this site is subject to DCPO - Development Contributions Plan Overlay - Schedule 2, DPO - Development Plan Overlay - Schedule 2, **SBO - Special Building Overlay**. Significant oversight on the planning report.
- 9. Section 6.5: Car parking assessment has been poorly conducted as previously stated throughout this correspondence.
- 10. Section 7.1: Brimbank Planning Policy Framework assessments: There is no assessment of the Keilor Downs Urban Design Framework document.
 - i. **This appears to be a significant oversight.**
- 11. Section 7.2: Land use. The statements here are inconsistent with the Commercial Zone 1 framework as previously explained in General Concerns 6. The large scale of proposed density may be appropriate for the proximity to the shopping area, but it is not consistent with a smooth transition between the low density dwellings immediately adjacent to the area.
 - i. **This appears to be a significant oversight.**
- 12. Section 7.8: As previously stated throughout this Correspondence, the stated allocation of parking is inconsistent and appears to be poorly calculated. This will undoubtedly result in additional parking outflows into the general residential area.
- 13. General: Of the Town Planning Report, there is a significant non-compliance that has been observed. From Clause 52.20-04: **Consultation requirements** Before the use or development commences: Public consultation, and consultation with the relevant municipal council, must be undertaken. A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to must be prepared to the satisfaction of the responsible authority
 - i. **Non-Compliant.** Public information sharing appears to have been poorly conducted, with sharing of relevant data and planning information to the community of Keilor Downs being assessed as significantly inappropriate. There has been little effort to share information with only a 150m radius of residential sites being advised of such a large build with implications to the wider community being ignored. The majority of the community has only been able to find the relevant information via the physical standing advice board at the site. Noting the impacts of COVID-19 and the relevant restrictions, this can only be reviewed as poorly considered and completely void of community impact assessment.

Transport Impact Assessment Concerns:

Parking assessments and driving assessments from the annexes of the document (by Onemilegrid). These parking diagrams show a barely achievable parking assessment, additionally is of note the 'impact' to the internal garage space with each vehicle diagram showing that the standard vehicle diagrams cannot fit within the garage. This is not consistent or appropriate with a reasonable assessment of parking conditions. Entry has not been considered. The presented turning radii do not appear to be achievable (specifically the 'red' vehicle in the diagram at Figure 1)

- i. **This is inappropriate and inconsiderate, additionally it can be considered unsafe.**

Figure 1 - Extract from Baptcare Public Reports



Conclusion:

In accordance with the exhaustive list of non-compliant, inappropriate and inconsistent statements in the provided reports, supported by the list of general concerns and poor circulation of information relating to the project providing clear non-compliance to sections required to get to this stage of planning as follows:

- 33. 52.20-1
- 34. 52.20-3
- 35. 52.20-4
- 36. 52.20-6.4

We request cancellation of this proposal and that reconsideration of the future planning in the area is conducted in a manner which is commensurate to and supportive of the local community needs. All reconsideration must be achieved through community input and via the required council planning solutions established in the Brimbank area.

Re: Baptcare development of 21A Copernicus Way, Keilor Downs

We (read: the respondents identified at Annex A of this document) are writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Baptcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. We live in Keilor Downs, many with young families and many who have been residents of Brimbank for over 20 years. Of this community there are those in various areas of employment, including professionals in the Health and Community Services sector with extensive experience and support the awareness of the needs of communities that the project would target.

There are several key planning issues with the proposal we request consideration of and accordingly an appropriate response to, additionally supported by an exhaustive list on non-compliant and poorly considered planning solutions identified at Annex B of this document.

Lack of Community Consultation and Culturally inclusive practice.

We were informed about this proposal recently from our neighbours who live within 150 metres of the proposed construction, or via viewing of the obscurely located planning advice sign. Subsequently, a community consultation meeting about the proposal was conducted by Baptcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project (estimated at no more than 15 residents), as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area which isn't often frequented by foot and is not accessible by car, and is additionally over 150m from the construction location. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents and is also non-compliant to Clause 52.20 of which this development's proposal is based upon.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English, and additionally, no alternative language service is available to understand the planning information. Some residents were able to attend the recent consultation meeting with Baptcare via Zoom, however measures were not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project whom are not familiar with technology services. It was evident from the meeting that this demographic was not present, and their voice continues to not have been heard.

In addition to this, there has been no consideration of the COVID-19 restrictions that are placed on the communities in Melbourne and the subsequent difficulty in access to information relating to this development; being that the only publicly available information is the obscurely positioned sign. This is further evidenced by the community itself forming this document, of it's own volition, with almost all residents being made aware via word of mouth.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above. To date, this information remains unavailable, unclear and unverified of fact.

We understand that Baptcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Baptcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Baptcare have changed their plan of building a

retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected. This is further supported by the significant lack of community consultation.

Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Baptcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

We direct you to Annex A and Annex B of this document for the persons who oppose this development and further evidence of the non-compliance to Clause 52.20.

Annex A - Individuals who oppose this development

Please find at the following link over 1000 local residents who are opposed to this development. Each of these individuals is to be considered as a formal respondent to this objection and as such included in Baptcare's formal review paper than is supplied to the

State Government or its Representatives in accordance with Clause 52.20 (Department of Health and Human Services or the Director of Housing)

Current petition for rejection: https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-kellor-downs?fbclid=IwAR10U3M1B4S21a_Z1SfZUc2lq1zQYOYb1U3GuFPiU0q0-Zw3V0P-Zmswiw

Annex B - Technical Assessment of Baptcare's Planning Reports

This assessment is generated from the following publically available reports:

<https://www.baptcare.org.au/services/housing/affordable-housing>

General Concerns:

1. This development is for 47 dwelling of unknown inhabitant numbers, however, it can be assumed that approximately 150 people will occupy this area. Given the significant numbers of inhabitants and dwellings being built, it is inappropriate that the distribution of advice relating to this build was only provided to a 150m radius of the build location. [REDACTED]
[REDACTED]. There will be significant impact to the surrounding area, including schools, public facilities (parks etc), community facilities (gyms/pools), retail and shopping facilities, of which the Keilor Downs community regularly utilise. The majority of the user community will remain unaware of this development. [REDACTED]
[REDACTED]
j. This is inappropriate and requested to be addressed.
2. Given the type of dwellings and number, this will no doubt have a significant impact on the house values within a far greater radius than 150m. Initial assessments would indicate the impact to be to no less than 3km surrounding the development. This has not been addressed in the reports and consideration has not been provided to this effect.
j. This is inappropriate and must be addressed for the impacted community.
3. The general Social Housing policy of 'One in Nine' is a method of disbursing social housing tenants throughout the community. This is in recognition of best practice australia wide, being that people experiencing disadvantage are far more likely to move along the housing continuum and out of disadvantage when they are part of a socially diverse community: rather than collate the disadvantaged community together in a complex that, over time, will only erode and decay into

- another block of social housing 'flats' like those already existing around areas of Melbourne. Additionally, the City's own policy, requires any development not subject future occupants to undesirable levels of disturbance and/or nuisance.
4. In addition to para 3. This development will house disadvantaged individuals in a single location further putting pressure on community well being.
 - j. **This is non-compliant** with Clause 21.03-1.
 5. Given the impact of social housing on local emergency services, and the significant number of new dwellings being built, there has been no review or consideration on the demand for local emergency services.
 - j. **This is a significant oversight.**
 6. The location of the development is in a Commercial Zone 1.
 - j. **This is non-compliant** inconsistent with the normal General Residential or Residential Growth Zone requirements to produce high density dwellings (ref Clause 21.02)

Town Planning Report Concerns:

1. The development of 47 dwellings and estimated 150 inhabitants is likely to result in no less than approximately 60 cars (based on unit distributions). A single car park appears to be poorly assessed, despite it passing Clause 52.20 basic requirements.
2. The planning report notes that this project is developed adjacent to a proposed aged care facility (future). This appears to be inconsistent and provides no assessment of the future transport requirements for the land parcel.
3. Clause 15.01-2S: Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.
 - j. **Non-compliant.** Property values will be significantly impacted. The proposed dwellings are inconsistent with all properties in the local area (proposed are high density - existing are not high density), incomplete consideration of parking requirements (only 47 spaces provided, well below assessed inhabitant requirements).
4. Clause 15.01-5S: Pattern of local urban structure and subdivision. Heritage values and built form that reflect community identity.
 - j. **Non-compliant.** There has been no consideration of the local housing representation which have existed for over 50 years. The new development is inconsistent in size/look/feel of the entire suburb.
5. Clause 21.02-3: Apply the Commercial 1 Zone to facilitate retail uses and mixed use development consistent with the primary purpose of the zone.
 - j. **Non-compliant.** This development is only residential in purpose. There is zero foreseeable consideration for this clause in the development. It has not been addressed.
6. Clause 21.04: Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.

- j. **Non-compliant.** The significance of moving from large parcel property of single dwellings immediately to high density dwellings is inconsistent.
- 7. Section 6.1: These statements are inconsistent with the requirements of Commercial Zone 1 and do not appear to be logical. Further detail and a re-write of the presented statements is essential.
 - j. **Non-Compliant.** There is no logic to the proposed project achieving any of the requirements of this Commercial Zone 1 requirements.
- 8. Section 6.3: Incorrectly states that this site is not subject to the Special Building Overlay.
 - j. **Non-Compliant.** All Land data states clearly that this site is subject to DCPO - Development Contributions Plan Overlay - Schedule 2, DPO - Development Plan Overlay - Schedule 2, **SBO - Special Building Overlay**. Significant oversight on the planning report.
- 9. Section 6.5: Car parking assessment has been poorly conducted as previously stated throughout this correspondence.
- 10. Section 7.1: Brimbank Planning Policy Framework assessments: There is no assessment of the Keilor Downs Urban Design Framework document.
 - j. **This appears to be a significant oversight.**
- 11. Section 7.2: Land use. The statements here are inconsistent with the Commercial Zone 1 framework as previously explained in General Concerns 6. The large scale of proposed density may be appropriate for the proximity to the shopping area, but it is not consistent with a smooth transition between the low density dwellings immediately adjacent to the area.
 - j. **This appears to be a significant oversight.**
- 12. Section 7.8: As previously stated throughout this Correspondence, the stated allocation of parking is inconsistent and appears to be poorly calculated. This will undoubtedly result in additional parking outflows into the general residential area.
- 13. General: Of the Town Planning Report, there is a significant non-compliance that has been observed. From Clause 52.20-04: Consultation requirements Before the use or development commences: Public consultation, and consultation with the relevant municipal council, must be undertaken. A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to must be prepared to the satisfaction of the responsible authority
 - j. **Non-Compliant.** Public information sharing appears to have been poorly conducted, with sharing of relevant data and planning information to the community of keilor downs being assessed as significantly inappropriate. There has been little effort to share information with only a 150m radius of residential sites being advised of such a large build with implications to the wider community being ignored. The majority of the community has only been able to find the relevant information via the physical standing advice board at the site. Noting the impacts of COVID-19 and the relevant restrictions, this can only be reviewed as poorly considered and completely void of community impact assessment.

Transport Impact Assessment Concerns:

Parking assessments and driving assessments from the annexes of the document (by Onemilegrid). These parking diagrams show a barely achievable parking assessment, additionally is of note the 'impact' to the internal garage space with each vehicle diagram showing that the standard vehicle diagrams cannot fit within the garage. This is not consistent or appropriate with a reasonable assessment of parking conditions. Entry has not been considered. The presented turning radii do not appear to be achievable (specifically the 'red' vehicle in the diagram at Figure 1)

j. **This is inappropriate and inconsiderate, additionally it can be considered unsafe.**

Figure 1 - Extract from Baptcare Public Reports



Conclusion:

In accordance with the exhaustive list of non-compliant, inappropriate and inconsistent statements in the provided reports, supported by the list of general concerns and poor circulation of information relating to the project providing clear non-compliance to sections required to get to this stage of planning as follows:

- 37. 52.20-1
- 38. 52.20-3
- 39. 52.20-4

40. 52.20-6.4

We request cancellation of this proposal and that reconsideration of the future planning in the area is conducted in a manner which is commensurate to and supportive of the local community needs. All reconsideration must be achieved through community input and via the required council planning solutions established in the Brimbank area.

94. **Re: Baptistcare development of 21A Copernicus Way, Keilor Downs**

We (read: the respondents identified at Annex A of this document) are writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Baptistcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. We live in Keilor Downs, many with young families and many who have been residents of Brimbank for over 20 years. Of this community there are those in various areas of employment, including professionals in the Health and Community Services sector with extensive experience and support the awareness of the needs of communities that the project would target.

There are several key planning issues with the proposal we request consideration of and accordingly an appropriate response to. additionally supported by an exhaustive list on non-compliant and poorly considered planning solutions identified at Annex B of this document.

Lack of Community Consultation and Culturally inclusive practice.

We were informed about this proposal recently from our neighbours who live within 150 metres of the proposed construction, or via viewing of the obscurely located planning advice sign. Subsequently, a community consultation meeting about the proposal was conducted by Baptistcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project (estimated at no more than 15 residents), as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area which isn't often frequented by foot and is not accessible by car, and is additionally over 150m from the construction location. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents and is also non-compliant to Clause 52.20 of which this development's proposal is based upon.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the

aforementioned flyer was not distributed in other languages apart from English, and additionally, no alternative language service is available to understand the planning information. Some residents were able to attend the recent consultation meeting with Baptcare via Zoom, however measures were not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project whom are not familiar with technology services. It was evident from the meeting that this demographic was not present, and their voice continues to not have been heard.

In addition to this, there has been no consideration of the COVID-19 restrictions that are placed on the communities in Melbourne and the subsequent difficulty in access to information relating to this development; being that the only publicly available information is the obscurely positioned sign. This is further evidenced by the community itself forming this document, of it's own volition, with almost all residents being made aware via word of mouth.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most

residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above. To date, this information remains unavailable, unclear and unverified of fact.

We understand that Bapcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Bapcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Bapcare have changed their plan of building a retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected. This is further supported by the significant lack of community consultation.

Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Bapcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

We direct you to Annex A and Annex B of this document for the persons who oppose this development and further evidence of the non-compliance to Clause 52.20.

Annex A - Individuals who oppose this development

Please find at the following link over 1000 local residents who are opposed to this development. Each of these individuals is to be considered as a formal respondent to this objection and as such included in Baptcare's formal review paper than is supplied to the State Government or its Representatives in accordance with Clause 52.20 (Department of Health and Human Services or the Director of Housing)

Current petition for rejection: https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilor-downs?fbclid=IwAR10U3M1B4S21a_Z1SfZUc2q1zQYOYb1U3GuFPIfU0g0-Zw3V0P-Zmswiw

Annex B - Technical Assessment of Baptcare's Planning Reports

This assessment is generated from the following publically available reports:

<https://www.baptcare.org.au/services/housing/affordable-housing>

General Concerns:

1. This development is for 47 dwelling of unknown inhabitant numbers, however, it can be assumed that approximately 150 people will occupy this area. Given the significant numbers of inhabitants and dwellings being built, it is inappropriate that the distribution of advice relating to this build was only provided to a 150m radius of the build location. [REDACTED]
[REDACTED] There will be significant impact to the surrounding area, including schools, public facilities (parks etc), community facilities (gyms/pools), retail and shopping facilities, of which the Keilor Downs community regularly utilise. The majority of the user community will remain unaware of this development. [REDACTED]
[REDACTED]
k. This is inappropriate and requested to be addressed.
2. Given the type of dwellings and number, this will no doubt have a significant impact on the house values within a far greater radius than 150m. Initial assessments would indicate the impact to be to no less than 3km surrounding the development. This has not been addressed in the reports and consideration has not been provided to this effect.
k. This is inappropriate and must be addressed for the impacted community.

3. The general Social Housing policy of 'One in Nine' is a method of disbursing social housing tenants throughout the community. This is in recognition of best practice australia wide, being that people experiencing disadvantage are far more likely to move along the housing continuum and out of disadvantage when they are part of a socially diverse community: rather than collate the disadvantaged community together in a complex that, over time, will only erode and decay into another block of social housing 'flats' like those already existing around areas of Melbourne. Additionally, the City's own policy, requires any development not subject future occupants to undesirable levels of disturbance and/or nuisance.
4. In addition to para 3. This development will house disadvantaged individuals in a single location further putting pressure on community well being.
 - k. **This is non-compliant** with Clause 21.03-1.
5. Given the impact of social housing on local emergency services, and the significant number of new dwellings being built, there has been no review or consideration on the demand for local emergency services.
 - k. This is a significant oversight.
6. The location of the development is in a Commercial Zone 1.
 - k. **This is non-compliant** inconsistent with the normal General Residential or Residential Growth Zone requirements to produce high density dwellings (ref Clause 21.02)

Town Planning Report Concerns:

1. The development of 47 dwellings and estimated 150 inhabitants is likely to result in no less than approximately 60 cars (based on unit distributions). A single car park appears to be poorly assessed, despite it passing Clause 52.20 basic requirements.
2. The planning report notes that this project is developed adjacent to a proposed aged care facility (future). This appears to be inconsistent and provides no assessment of the future transport requirements for the land parcel.
3. Clause 15.01-2S: Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.
 - k. **Non-compliant.** Property values will be significantly impacted. The proposed dwellings are inconsistent with all properties in the local area (proposed are high density - existing are not high density). incomplete consideration of parking requirements (only 47 spaces provided, well below assessed inhabitant requirements).
4. Clause 15.01-5S: Pattern of local urban structure and subdivision. Heritage values and built form that reflect community identity.
 - k. **Non-compliant.** There has been no consideration of the local housing representation which have existed for over 50 years. The new development is inconsistent in size/look/feel of the entire suburb.
5. Clause 21.02-3: Apply the Commercial 1 Zone to facilitate retail uses and mixed use development consistent with the primary purpose of the zone.
 - k. **Non-compliant.** This development is only residential in purpose. There is zero foreseeable consideration for this clause in the development. It has not been addressed.

6. Clause 21.04: Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.
 - k. **Non-compliant.** The significance of moving from large parcel property of single dwellings immediately to high density dwellings is inconsistent.
7. Section 6.1: These statements are inconsistent with the requirements of Commercial Zone 1 and do not appear to be logical. Further detail and a re-write of the presented statements is essential.
 - k. **Non-Compliant.** There is no logic to the proposed project achieving any of the requirements of this Commercial Zone 1 requirements.
8. Section 6.3: Incorrectly states that this site is not subject to the Special Building Overlay.
 - k. **Non-Compliant.** All Land data states clearly that this site is subject to DCPO - Development Contributions Plan Overlay - Schedule 2, DPO - Development Plan Overlay - Schedule 2, **SBO - Special Building Overlay.** Significant oversight on the planning report.
9. Section 6.5: Car parking assessment has been poorly conducted as previously stated throughout this correspondence.
10. Section 7.1: Brimbank Planning Policy Framework assessments: There is no assessment of the Keilor Downs Urban Design Framework document.
 - k. **This appears to be a significant oversight.**
11. Section 7.2: Land use. The statements here are inconsistent with the Commercial Zone 1 framework as previously explained in General Concerns 6. The large scale of proposed density may be appropriate for the proximity to the shopping area, but it is not consistent with a smooth transition between the low density dwellings immediately adjacent to the area.
 - k. **This appears to be a significant oversight.**
12. Section 7.8: As previously stated throughout this Correspondence, the stated allocation of parking is inconsistent and appears to be poorly calculated. This will undoubtedly result in additional parking outflows into the general residential area.
13. General: Of the Town Planning Report, there is a significant non-compliance that has been observed. From Clause 52.20-04: Consultation requirements Before the use or development commences: Public consultation, and consultation with the relevant municipal council, must be undertaken. A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to must be prepared to the satisfaction of the responsible authority
 - k. **Non-Compliant.** Public information sharing appears to have been poorly conducted, with sharing of relevant data and planning information to the community of keilor downs being assessed as significantly inappropriate. There has been little effort to share information with only a 150m radius of residential sites being advised of such a large build with implications to the wider community being ignored. The majority of the community has only been able to find the relevant information via the physical standing advice board at the site. Noting the impacts of COVID-19 and the relevant restrictions, this can only be reviewed as poorly considered and completely void of community impact assessment.

Transport Impact Assessment Concerns:

Parking assessments and driving assessments from the annexes of the document (by Onemilegrid). These parking diagrams show a barely achievable parking assessment, additionally is of note the 'impact' to the internal garage space with each vehicle diagram showing that the standard vehicle diagrams cannot fit within the garage. This is not consistent or appropriate with a reasonable assessment of parking conditions. Entry has not been considered. The presented turning radii do not appear to be achievable (specifically the 'red' vehicle in the diagram at Figure 1)

- k. **This is inappropriate and inconsiderate, additionally it can be considered unsafe.**

Figure 1 - Extract from Baptcare Public Reports



Conclusion:

In accordance with the exhaustive list of non-compliant, inappropriate and inconsistent statements in the provided reports, supported by the list of general concerns and poor circulation of information relating to the project providing clear non-compliance to sections required to get to this stage of planning as follows:

- 41. 52.20-1
- 42. 52.20-3

43. 52.20-4
44. 52.20-6.4

We request cancellation of this proposal and that reconsideration of the future planning in the area is conducted in a manner which is commensurate to and supportive of the local community needs. All reconsideration must be achieved through community input and via the required council planning solutions established in the Brimbank area.

95. **Re: Baptistcare development of 21A Copernicus Way, Keilor Downs**

We (read: the respondents identified at Annex A of this document) are writing to you to raise important concerns about a housing project planned for the Keilor Downs area. Residents of the area have recently become aware of the proposal by the Baptistcare Affordable Housing Project to construct 47 units at No. 21A Copernicus Way, Keilor Downs adjacent to Keilor Downs Plaza and as part of Victoria's Big Housing Build Program. We live in Keilor Downs, many with young families and many who have been residents of Brimbank for over 20 years. Of this community there are those in various areas of employment, including professionals in the Health and Community Services sector with extensive experience and support the awareness of the needs of communities that the project would target.

There are several key planning issues with the proposal we request consideration of and accordingly an appropriate response to. additionally supported by an exhaustive list on non-compliant and poorly considered planning solutions identified at Annex B of this document.

Lack of Community Consultation and Culturally inclusive practice.

We were informed about this proposal recently from our neighbours who live within 150 metres of the proposed construction, or via viewing of the obscurely located planning advice sign. Subsequently, a community consultation meeting about the proposal was conducted by Baptistcare and Urbis (the town planning partner) on October 12th where they stated that a flyer drop had only been conducted and targeted residents who live within 150m of the site. This would barely cover any residents in the vicinity of the proposed project (estimated at no more than 15 residents), as one side is the plaza, another is the new aquatics centre, another is vacant land and finally the other side includes residents in Thornhill Drive, Milas Court, and Packard Street. Some of these residents have not received any communication, while others noted a letter in the mail from the council a week ago. All other affected residents who do not live within a 150-metre vicinity of the proposed project were not informed. Moreover, the small permit signage has been hidden away in an area which isn't often frequented by foot and is not accessible by car, and is additionally over 150m from the construction location. A lack of appropriate community consultation of those affected by the development has especially aggrieved residents and is also non-compliant to Clause 52.20 of which this development's proposal is based upon.

The consultation process also lacks sensitivity to the demographic background of the residents. A majority of those living in Keilor Downs represent an elderly demographic including those within 150 metres. Most have English as their second language and the aforementioned flyer was not distributed in other languages apart from English, and additionally, no alternative language service is available to understand the planning information. Some residents were able to attend the recent consultation meeting with Baptcare via Zoom, however measures were not taken to include those elderly citizens, both English and non-English speaking, that live closer to the proposed project whom are not familiar with technology services. It was evident from the meeting that this demographic was not present, and their voice continues to not have been heard.

In addition to this, there has been no consideration of the COVID-19 restrictions that are placed on the communities in Melbourne and the subsequent difficulty in access to information relating to this development; being that the only publicly available information is the obscurely positioned sign. This is further evidenced by the community itself forming this document, of it's own volition, with almost all residents being made aware via word of mouth.

Social infrastructure, amenity, and access

The additional 47 units in the proposed location flags concerns with regards to suitable access to services such as NDIS, major public hospitals and other social and community services for the cohort that has been identified to live at this site. An assumption is made that these residents will have their driver's licence, but no consideration is being given to those with a disability who do not drive and require appropriate disability access to a train line that goes directly into the CBD where most of the major public hospitals are situated. As such, there is a lack of foresight and sensitivity into the needs of vulnerable communities given the limited public transport options at the site

The location of the proposed development would also place further strain on our Health and Community Services workforce. It would mean staff being further stretched to service the needs of communities that do not have access to train lines for specialist services that are often based in the CBD or inner-city suburbs. Transporting families to services would inevitably take focus away from other important Child Protection work or other community services related functions.

Access to childcare facilities is stretched in Keilor Downs. Childcare and kindergartens are at full capacity and current residents are already on waiting lists to secure an enrolment for their child. Vulnerable families entering the area would find limited access to these needed services and create another stressor for them which would potentially further their disadvantage and exacerbate family mental health issues. Longer term, a lack of access to community-based facilities poses economic and social costs for the government wherein a lack of childcare services for instance translates to more children at risk of entering the Out of Home Care system.

Accountability and Transparency

In the recent consultation meeting, Baptistcare claimed they surveyed struggling Melburnians around the topic of their suburb of choice for a social housing development, reporting the overwhelming majority indicated Keilor Downs as their preference. Most residents are questioning the transparency of this claim and request Victorian government assistance in obtaining the survey results to verify the above. To date, this information remains unavailable, unclear and unverified of fact.

We understand that Baptistcare have owned the large parcel of land including the proposed development site between Copernicus Way and Thornhill Drive for the past 7-8 years. Baptistcare was previously planning to build a retirement village aligned with the longer-term demographic changes and needs of an ageing population in Keilor Downs. This plan has now been shelved with the recent Victorian Government announcement of the \$150m Affordable housing grant. Baptistcare have changed their plan of building a retirement village to a plan for an affordable housing development on the land. This approach appears to reflect financial opportunism rather than being aligned with the needs of the communities affected. This is further supported by the significant lack of community consultation.

Density, impact of traffic, and COVID 19.

The addition of 47 units in a clustered fashion will add to traffic and social congestion and limit the capacity to sustain adequate social distancing. Brimbank is considered one of the areas where COVID 19 positive cases remain high. There are currently 1441 active cases of Coronavirus in Brimbank, and it remains on the top five list of LGA's with the most cases across the state. Although the state's target is to increase vaccination rates, the ongoing need to maintain social distancing is less likely to be adequately achieved in the proposed site and surrounding neighbourhood.

The ABS population data from 2016 for Keilor Downs indicated people aged 65 years and over made up 16.9% of the population. Brimbank is also the second most culturally diverse Local Government Area in Victoria with people coming from more than 160 countries. In 2016, 58.3% of Brimbank residents spoke a language other than English at home compared with 32.3% of Greater Melbourne (ABS 2016 Census). This data highlights the risk factors for the Keilor Downs community due to its ageing population and culturally diverse community that requires additional resources to support with understanding the risks associated with COVID 19. The proposal for clustered housing by Baptistcare has the potential to exacerbate the serious risks of Covid-19 to the Keilor Downs community, particularly those over 65 years.

In closing, clustered social housing is not in the best interests of the residents who will be living in them or the broader community in Keilor Downs. The proposed development does not consider the challenges associated with Keilor Downs being an ageing population. High density housing will pose health risks for vulnerable communities and put pressure on the already stretched community services across Brimbank. There is a lack of consideration for the amenity of vulnerable residents in the proposed development that will translate to poorer social, health and economic outcomes. These sentiments are shared by other members in the community that I have spoken to and is evident via the active petition that is currently in progress.

We direct you to Annex A and Annex B of this document for the persons who oppose this development and further evidence of the non-compliance to Clause 52.20.

Annex A - Individuals who oppose this development

Please find at the following link over 1000 local residents who are opposed to this development. Each of these individuals is to be considered as a formal respondent to this objection and as such included in Baptcare's formal review paper than is supplied to the State Government or its Representatives in accordance with Clause 52.20 (Department of Health and Human Services or the Director of Housing)

Current petition for rejection: https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilor-downs?fbclid=IwAR10U3M1B4S21a_Z1SfZUc2lq1zQYOYb1U3GuFPifU0g0-Zw3V0P-Zmswiw

Annex B - Technical Assessment of Baptcare's Planning Reports

This assessment is generated from the following publically available reports:
<https://www.baptcare.org.au/services/housing/affordable-housing>

General Concerns:

1. This development is for 47 dwelling of unknown inhabitant numbers, however, it can be assumed that approximately 150 people will occupy this area. Given the significant numbers of inhabitants and dwellings being built, it is inappropriate that the distribution of advice relating to this build was only provided to a 150m radius of the build location. This is unlikely to have reached more than 15 dwellings. There will be significant impact to the surrounding area, including schools, public facilities (parks etc), community facilities (gyms/pools), retail and shopping facilities, of which the Keilor Downs community regularly utilise. The majority of the user community will remain unaware of this development. Furthermore it is with great disappointment that the COVID-19 restrictions were not taken into considerations, nor was the local council engaged for possible email sharing of this information. This has led to significantly inadequate sharing of the significance of 47 additional dwellings being built which would constitute the volume of dwellings along a 1km stretch of road in this area
 - i. **This is inappropriate and requested to be addressed.**

2. Given the type of dwellings and number, this will no doubt have a significant impact on the house values within a far greater radius than 150m. Initial assessments would indicate the impact to be to no less than 3km surrounding the development. This has not been addressed in the reports and consideration has not been provided to this effect.
 - i. **This is inappropriate and must be addressed for the impacted community.**
3. The general Social Housing policy of 'One in Nine' is a method of disbursing social housing tenants throughout the community. This is in recognition of best practice australia wide, being that people experiencing disadvantage are far more likely to move along the housing continuum and out of disadvantage when they are part of a socially diverse community; rather than collate the disadvantaged community together in a complex that, over time, will only erode and decay into another block of social housing 'flats' like those already existing around areas of Melbourne. Additionally, the City's own policy, requires any development not subject future occupants to undesirable levels of disturbance and/or nuisance.
4. In addition to para 3. This development will house disadvantaged individuals in a single location further putting pressure on community well being.
 - i. **This is non-compliant** with Clause 21.03-1.
5. Given the impact of social housing on local emergency services, and the significant number of new dwellings being built, there has been no review or consideration on the demand for local emergency services.
 - i. **This is a significant oversight.**
6. The location of the development is in a Commercial Zone 1.
 - i. **This is non-compliant** inconsistent with the normal General Residential or Residential Growth Zone requirements to produce high density dwellings (ref Clause 21.02)

Town Planning Report Concerns:

1. The development of 47 dwellings and estimated 150 inhabitants is likely to result in no less than approximately 60 cars (based on unit distributions). A single car park appears to be poorly assessed, despite it passing Clause 52.20 basic requirements.
2. The planning report notes that this project is developed adjacent to a proposed aged care facility (future). This appears to be inconsistent and provides no assessment of the future transport requirements for the land parcel.
3. Clause 15.01-2S: Minimise the detrimental impact of development on neighbouring properties, the public realm and the natural environment.
 - i. **Non-compliant.** Property values will be significantly impacted. The proposed dwellings are inconsistent with all properties in the local area (proposed are high density - existing are not high density), incomplete consideration of parking requirements (only 47 spaces provided, well below assessed inhabitant requirements).
4. Clause 15.01-5S: Pattern of local urban structure and subdivision. Heritage values and built form that reflect community identity.
 - i. **Non-compliant.** There has been no consideration of the local housing representation which have existed for over 50 years. The new development is inconsistent in size/look/feel of the entire suburb.

5. Clause 21.02-3: Apply the Commercial 1 Zone to facilitate retail uses and mixed use development consistent with the primary purpose of the zone.
 - i. **Non-compliant.** This development is only residential in purpose. There is zero foreseeable consideration for this clause in the development. It has not been addressed.
6. Clause 21.04: Housing: develop high quality well-designed neighbourhoods that will meet a diversity of housing needs, increase residential density in activity centres and the Residential Growth Zone while support the development of non residential uses that provide a service to the community.
 - i. **Non-compliant.** The significance of moving from large parcel property of single dwellings immediately to high density dwellings is inconsistent.
7. Section 6.1: These statements are inconsistent with the requirements of Commercial Zone 1 and do not appear to be logical. Further detail and a re-write of the presented statements is essential.
 - i. **Non-Compliant.** There is no logic to the proposed project achieving any of the requirements of this Commercial Zone 1 requirements.
8. Section 6.3: Incorrectly states that this site is not subject to the Special Building Overlay.
 - i. **Non-Compliant.** All Land data states clearly that this site is subject to DCPO - Development Contributions Plan Overlay - Schedule 2, DPO - Development Plan Overlay - Schedule 2, **SBO - Special Building Overlay.** Significant oversight on the planning report.
9. Section 6.5: Car parking assessment has been poorly conducted as previously stated throughout this correspondence.
10. Section 7.1: Brimbank Planning Policy Framework assessments: There is no assessment of the Keilor Downs Urban Design Framework document.
 - i. **This appears to be a significant oversight.**
11. Section 7.2: Land use. The statements here are inconsistent with the Commercial Zone 1 framework as previously explained in General Concerns 6. The large scale of proposed density may be appropriate for the proximity to the shopping area, but it is not consistent with a smooth transition between the low density dwellings immediately adjacent to the area.
 - i. **This appears to be a significant oversight.**
12. Section 7.8: As previously stated throughout this Correspondence, the stated allocation of parking is inconsistent and appears to be poorly calculated. This will undoubtedly result in additional parking outflows into the general residential area.
13. General: Of the Town Planning Report, there is a significant non-compliance that has been observed. From Clause 52.20-04: Consultation requirements Before the use or development commences: Public consultation, and consultation with the relevant municipal council, must be undertaken. A report that summarises the consultation undertaken, feedback received, and explains how the feedback has been considered and responded to must be prepared to the satisfaction of the responsible authority
 - i. **Non-Compliant.** Public information sharing appears to have been poorly conducted, with sharing of relevant data and planning information to the community of keilor downs being assessed as significantly inappropriate. There has been little effort to share information with only a 150m radius of residential sites being advised of such a large build with implications to the wider community being ignored. The majority of the community has only been able to find the relevant information via the physical standing advice board at the site. Noting the impacts of COVID-19 and the

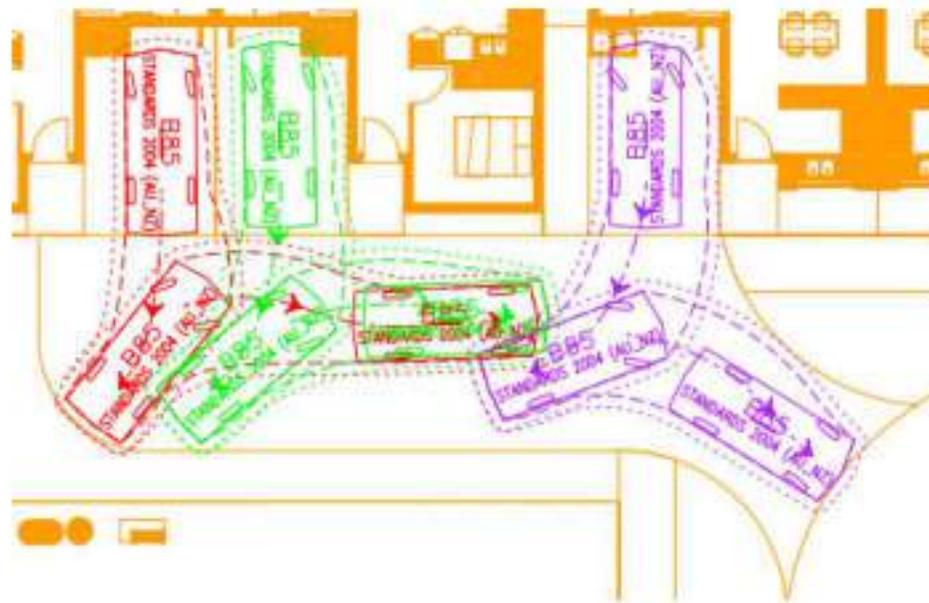
relevant restrictions, this can only be reviewed as poorly considered and completely void of community impact assessment.

Transport Impact Assessment Concerns:

Parking assessments and driving assessments from the annexes of the document (by Onemilegrid). These parking diagrams show a barely achievable parking assessment, additionally is of note the 'impact' to the internal garage space with each vehicle diagram showing that the standard vehicle diagrams cannot fit within the garage. This is not consistent or appropriate with a reasonable assessment of parking conditions. Entry has not been considered. The presented turning radii do not appear to be achievable (specifically the 'red' vehicle in the diagram at Figure 1)

- i. **This is inappropriate and inconsiderate, additionally it can be considered unsafe.**

Figure 1 - Extract from Baptcare Public Reports



Conclusion:

In accordance with the exhaustive list of non-compliant, inappropriate and inconsistent statements in the provided reports, supported by the list of general concerns and poor circulation of information relating to the project providing clear non-compliance to sections required to get to this stage of planning as follows:

- 45. 52.20-1
- 46. 52.20-3
- 47. 52.20-4
- 48. 52.20-6.4

We request cancellation of this proposal and that reconsideration of the future planning in the area is conducted in a manner which is commensurate to and supportive of the local community needs. All reconsideration must be achieved through community input and via the required council planning solutions established in the Brimbank area.



CONSULTATION FEEDBACK FORM
BAPTCARE AFFORDABLE HOUSING PROPOSAL
NO. 21A COPERNICUS WAY, KEILOR DOWNS

Important Note: your submission will be included within a feedback report which is required by Homes Victoria to be made publicly available following a decision on the proposal.

| | |
|-------------------|--|
| Name: | |
| Address: | |
| Postal Address: | |
| Email Address: | |
| Telephone Number: | |

Please provide your feedback on the proposal:

I strongly object to the Bapcare Affordable Housing proposal @ No. 21A Copernicus Way, Keilor Downs

How will you be affected by the proposal:

- Area will become over populated, squeezing, congested, more traffic obstruction. High density
 my back yard fence meets the huge parking of the new St. Albans Leaswe Centre.
1. In this area we have a shopping centre, Centro
 2. Construction of a huge Leaswe Centre.
 3. A private community hall.

| | |
|------------|----------|
| Signature: | Date: |
| | 19/10/21 |

4. Huge Apartment Complex still in construction
- That's enough! I oppose to this proposal!

APPENDIX D PETITION

A petition was set up online and gathered over 1300 signatures at the time of finalising this report. The petition can be accessed at:

<https://www.change.org/p/richard-wynne-the-minister-for-planning-and-housing-objection-to-housing-development-in-keilor-downs>

APPENDIX E

APPROVED CONSULTATION PACK

Consultation strategy

Clauses 52.20

Baptcare Affordable Housing - 21A Copernicus Way, Keilor Downs

| Requirement | Response |
|---|---|
| <p>Provide a written description of the development proposal including, but not limited to:</p> | <ul style="list-style-type: none"> - 47 dwellings, including 31 single storey dwellings arranged around the perimeter of the site, and 16 dwellings contained within four double storey forms located centrally on the site. - One car parking space per dwelling totalling 48 spaces. - Single storey dwellings have a maximum height of 4.8m, double storey buildings have a maximum height of 8.15m. - The access road connects to Thornhill Drive and new dwellings are accessed from a new loop road through the site. - Landscaping throughout the site. |
| <p>Detail any consultation that has already occurred (if relevant) and attach supporting documentation</p> | <p>Pre-application meeting held on 24/08/2021 with Brimbank City Council (James Bruscella, Dhiraj Joti, Bahareh Motamed), plan reference 210016/TP00-TP15 dated 13/08/2021</p> |
| <p>Indicate the type of consultation that is required by the Guidelines</p> | <p>In accordance with Table 1 of the Homes Victoria Consultation Guidelines, the proposal is subject to the 30-99 dwellings consultation stream.</p> |
| <p>Identify relevant Council</p> | <p>Brimbank City Council</p> |
| <p>Identify referral authorities (if relevant)</p> | <p>Clause 44.05-5 – Relevant Floodplain Management Authority (noting the SBO does not apply to the area of the site where development is proposed).</p> |
| <p>Attach a map of neighbouring and nearby properties, indicating those properties whose <u>owners</u> and <u>occupiers</u> will receive letters and the <u>location of site notices</u> on property frontages</p> | <p>See attached showing which properties are required to be notified under the Guidelines.</p> |
| <p>Attach a current set of design plans, including landscape plans, to be used for consultation and provide a written reference in this table. See page 6 of the Guidelines for required plan detail</p> | <p>Architectural plans prepared by CHC Architects Landscape plans prepared by FFLA Landscape Architects</p> |
| <p>Attach a current set of supporting documentation (i.e. Planning Report, Environmental Impact Report, etc.) to be used for consultation and provide a written reference in this table</p> | <p>Planning Report prepared by Urbis Sustainability Management Plan prepared by Energy Water Environment Transport Impact Assessment prepared by OneMileGrid Stormwater Management Plan prepared by FMG Engineering</p> |

[Title] [First name] [Surname]
[Company]
[Address]

22 September 2021

Dear [Name],

CONSULTATION LETTER - BAPTCARE AFFORDABLE HOUSING PROPOSAL NO. 21A COPERNICUS WAY, KEILOR DOWNS

INTRODUCTION

This letter is provided to inform you about a Baptcare Affordable Housing project which is proposed nearby at No. 21A Copernicus Way, Keilor Downs, as part of Victoria's Big Housing Build Program. The Big Housing Build Program seeks to deliver new homes for Victorians and create new jobs to assist Victoria's economic recovery from the impacts of the COVID-19 pandemic.

To facilitate the Big Housing Build Program, the Victorian Government introduced a new clause into planning schemes across Victoria, including the Brimbank Planning Scheme. *Clause 52.20 – Big Housing Build* streamlines the planning assessment and approval process for social and affordable housing projects. Under Clause 52.20, applicants must first seek feedback from the community and Brimbank City Council. This feedback is then considered before the application is finalised and submitted for assessment by the Department of Environment, Land, Water and Planning on behalf of the Minister for Energy, Environment and Climate Change. This streamlined process is different from the normal application process as feedback is sought before submission of the application, rather than after an application is submitted. This allows for feedback to be incorporated into the final design before it is submitted for assessment.

The streamlined planning provisions under Clause 52.20 include development standards which ensure appropriate car parking and access arrangements are provided, and which limit amenity impacts on land surrounding the development site. More information on the Victoria's Big Housing Build Program, including all requirements of Clause 52.20 can be found at <https://www.planning.vic.gov.au/permits-and-applications/big-housing-build> .

THE PROPOSAL

Baptcare Affordable Housing seeks to develop No. 21A Copernicus Way, Keilor Downs with 47 new affordable dwellings, comprised of 23 single storey dwellings and 24 double storey dwellings. The single storey dwellings are arranged around the boundaries of the site, and the double storey dwellings are located centrally on the site. The homes will be accessed by a new loop road through the site which connects to Thornhill Drive. Each home is provided with one car parking space, and landscaping is proposed across the site in front and rear yards and within new nature strips. Baptcare Affordable Housing seeks your feedback on this proposal.

The proposal is supported by the following information:

- Architectural Plans
- Landscape Plans

- Town Planning Report
- Transport Impact Assessment
- Sustainable Management Plan

These documents can be accessed online at:

www.baptcare.org.au/services/housing/affordable-housing

If you wish to obtain coloured copies of the plans, please contact Phil Gleeson or Helen Allison, details provided below.

HOW TO PROVIDE YOUR FEEDBACK

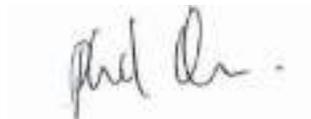
Baptcare Affordable Housing seeks your feedback on the proposal at No. 21A Copernicus Way, Keilor Downs. This feedback should be provided before the consultation closing date **DATE**. A feedback form is provided with this letter. Please provide your feedback via:

- Post, to:
 - Phil Gleeson or Helen Allison
 - Urbis
 - Olderfeet Building
 - Level 10, 477 Collins Street
 - Melbourne VIC 3000
- Email, to Phil Gleeson at Urbis – pgleeson@urbis.com.au or to Helen Allison at Urbis – hallison@urbis.com.au
- If you wish to attend an online consultation forum, please register your details with Phil Gleeson or Helen Allison (email address above and phone number below). An invitation and meeting link will be issued to you so that you may attend the online consultation forum and discuss the project further with Baptcare Affordable Housing and the project team. The online consultation will occur on **12th October 2021 between 6:00pm and 7:00pm**.

Following the conclusion of the consultation period, feedback will be considered and included in a report which will be submitted with the application to the Department of Environment, Land, Water and Planning. This report will detail how the feedback has been considered and any changes made to the proposal as a result. We note that as required by Homes Victoria, the feedback report will be made publicly available once a decision on this project is reached.

If you have any queries about the project at No. 21A Copernicus Way, Keilor Downs, or the consultation process, please contact Phil Gleeson on 03 8663 4949 or Helen Allison on 03 9617 6632.

Yours sincerely,



Phil Gleeson
Director Urbis, for and behalf of Baptcare Affordable Housing

CONSULTATION FEEDBACK FORM
BAPTCARE AFFORDABLE HOUSING PROPOSAL
NO. 21A COPERNICUS WAY, KEILOR DOWNS

Important Note: your submission will be included within a feedback report which is required by Homes Victoria to be made publicly available following a decision on the proposal.

| | |
|-------------------|--|
| Name: | |
| Address: | |
| Postal Address: | |
| Email Address: | |
| Telephone Number: | |

Please provide your feedback on the proposal:

| |
|--|
| |
|--|

How will you be affected by the proposal:

| |
|--|
| |
|--|

| | |
|------------|-------|
| Signature: | Date: |
|------------|-------|

NOTICE OF AN APPLICATION FOR PLANNING CONSENT

Consent is sought pursuant to Clause 52.20 – Victoria’s Big Housing Build

| | |
|---|----------------------------------|
| The land affected by the application is located at: | 21A Copernicus Way, Keilor Downs |
|---|----------------------------------|

| | |
|-------------------------|--|
| The application is for: | Affordable housing development comprising the construction of 47 dwellings, including 23 single storey dwellings and 24 double storey dwellings. One car parking space will be provided for each dwelling. A new road is proposed to connect to Pinetree Crescent. |
|-------------------------|--|

| | |
|-------------------|-----------------------------|
| The applicant is: | Baptcare Affordable Housing |
|-------------------|-----------------------------|

| | |
|--|--|
| You may look at the application and any documents that support the application at: | <p>www.baptcare.org.au/services/housing/affordable-housing</p> <p>Should you require physical copies of plans and supporting documents, please contact: Phil Gleeson – pgleeson@urbis.com.au Helen Allison – hallison@urbis.com.au Phone: 03 8663 4888</p> |
|--|--|

An online information forum will be held on **Tuesday 12th October between 6:00pm and 7:00pm**. If you wish to attend, please contact Phil Gleeson or Helen Allison (contact details listed above)

Any person who may be affected by the approval of this proposal may make a submission via:

| | |
|------|---|
| Post | Phil Gleeson or Helen Allison Urbis Olderfleet Building Level 10, 477 Collins Street Melbourne VIC 3000 |
|------|---|

| | |
|-------|---|
| Email | Phil Gleeson – pgleeson@urbis.com.au Helen Allison – hallison@urbis.com.au |
|-------|---|

| | |
|-------------------|---|
| Online Submission | To be submitted to pgleeson@urbis.com.au or hallison@urbis.com.au |
|-------------------|---|

| | |
|--------------------------------------|--------------------|
| The closing date for submissions is: | INSERT DATE |
|--------------------------------------|--------------------|

Following the conclusion of the consultation period, feedback will be considered and included in a report which will be submitted with the application to the Department of Environment, Land, Water and Planning. This report will detail how the feedback has been considered and any changes made to the proposal as a result. We note that as required by Homes Victoria, the feedback report will be made publicly available once a decision on this project is reached.

Website 'landing' text:

Victoria's Big Housing Build Program – No. 21A Copernicus Way, Keilor Downs

Welcome to Bapcare Affordable Housing's information page for the proposed development at No. 21A Copernicus Way, Keilor Downs. Bapcare Affordable Housing seeks to develop No. 21A Copernicus Way, Keilor Downs with 47 new affordable homes, comprised of 23 single storey and 24 double storey dwellings. These dwellings will be accessed by a new loop road through the site which connects to Thornhill Drive. Each home is provided with one car parking space, and landscaping is proposed across the site in front and rear yards and within new nature strips. Bapcare Affordable Housing seeks your feedback on this proposal.

This project is proposed as part of Victoria's Big Housing Build Program, which seeks to deliver much-needed new homes for Victorians and create new jobs to support Victoria's economic recovery. The Victorian Government have introduced a new Clause 52.20 to Planning Schemes across Victoria which streamlines the planning assessment and approval process, whilst still assessing important factors including design, landscaping and car parking, and limiting amenity impacts on surrounding land. As part of this process, feedback from the community and from Council is gathered before the design is finalised and submitted for assessment by the Department of Environment, Land, Water and Planning on behalf of the Minister for Energy, Environment and Climate Change.

On this page you can:

- Learn more about the project at No. 21A Copernicus Way, Keilor Downs, including viewing proposed architectural plans and landscape plans ([CLICK HERE](#))
- Access specialist reports which address different aspects of the proposal, including the Town Planning Report, Transport Impact Assessment Report, Sustainability Management Plan and Stormwater Management plan ([CLICK HERE](#))
- Register your interest to join an interactive online forum hosted by Bapcare Affordable Housing and members of the project team to discuss the proposal and answer any questions you may have. Please email Phil Gleeson – pgleeson@urbis.com.au or Helen Allison – hallison@urbis.com.au An online consultation is proposed on **Tuesday 12th October between 6:00pm and 7:00pm.**
- Provide feedback on the proposal by emailing Phil Gleeson – pgleeson@urbis.com.au or Helen Allison – hallison@urbis.com.au Feedback via post should be addressed to:

Phil Gleeson or Helen Allison
Urbis
Olderfleet Building
Level 10, 477 Collins Street
Melbourne VIC 3000

- Learn more about Victoria's Big Housing Build Program, including the requirements of Clause 52.20, at <https://www.planning.vic.gov.au/permits-and-applications/big-housing-build>



21A COPERNICUS WAY, KEILOR DOWNS

SITE LOCATION

APPENDIX F

CONSULTATION MEETING SLIDES

KEILOR DOWNS

COMMUNITY CONSULTATION SESSION

October 2021

Clarke
Hopkins
Clarke

URBIS

Baptcare
Affordable
Housing



AGENDA

BAPTCARE AFFORDABLE HOUSING

WHAT IS PROPOSED?

PLANNING PROCESS

HOW CAN YOU PARTICIPATE?

NEXT STEPS

QUESTIONS / DISCUSSION



BAPTCARE AFFORDABLE HOUSING



A subsidiary of Baptistcare, Baptistcare Affordable Housing (BAH) is a not for profit organisation providing affordable, well-located, and well-built housing for people on lower incomes who are at risk of, or are experiencing, homelessness.

- Providing a home to over 170 residents, we currently manage 100 apartments, units and houses across communities in Victoria and Tasmania.



WHAT IS SOCIAL HOUSING?



Social housing is an umbrella term that includes both public housing and community housing. It generally indicates housing that involves some degree of subsidy – source – Homes Victoria

- For this project, all dwellings will remain in the ownership of BAH and rented to tenants

WHAT ROLE DOES BAH HAVE IN THE DELIVERY AND MANAGEMENT OF SOCIAL HOUSING?



Own and develop the proposed social housing

- Maintain the development
- BAH manages its tenancies in accordance with the Residential Tenancy Act

HOW ARE TENANTS DETERMINED?



BAH determines residents from the Victorian Housing Register. This is a waiting list of people who qualify as in need of social housing and who have expressed a desire to be housed in the locale

- These are residents who currently reside within the City of Brimbank- they are existing members of the community

WHAT IS THE TARGET DEMOGRAPHIC FOR THE SITE

These homes are targeted at:



Single older people in
37x single bedroom homes



Young mothers and small families in
6x two bedroom homes



Low income working families in
4x three bedroom homes

Baptcare Affordable Housing is contractually bound to accept residents from the Victorian Housing Register.

This proposal adjoins the approved Baptcare residential aged care home to the north. It is important that for the broader community and the proposed residential aged care home, the proposed use and development does not impact the amenity of the area.

WHAT ARE THE KEY OBLIGATIONS OF TENANTS?



- Look after the property
- Let their neighbours live in peace
- Pay the rent

WHAT IS PROPOSED?



WHAT IS PROPOSED

47 homes using four different layouts, with one-, two- and three-bedroom options



23 single storey homes



24 homes within double storey buildings



Each home has one car park



Design Narrative

"Creating healthy communities for today and the future, where every person is cherished."



An Inclusive &
Sustainable Community



Outdoor Living

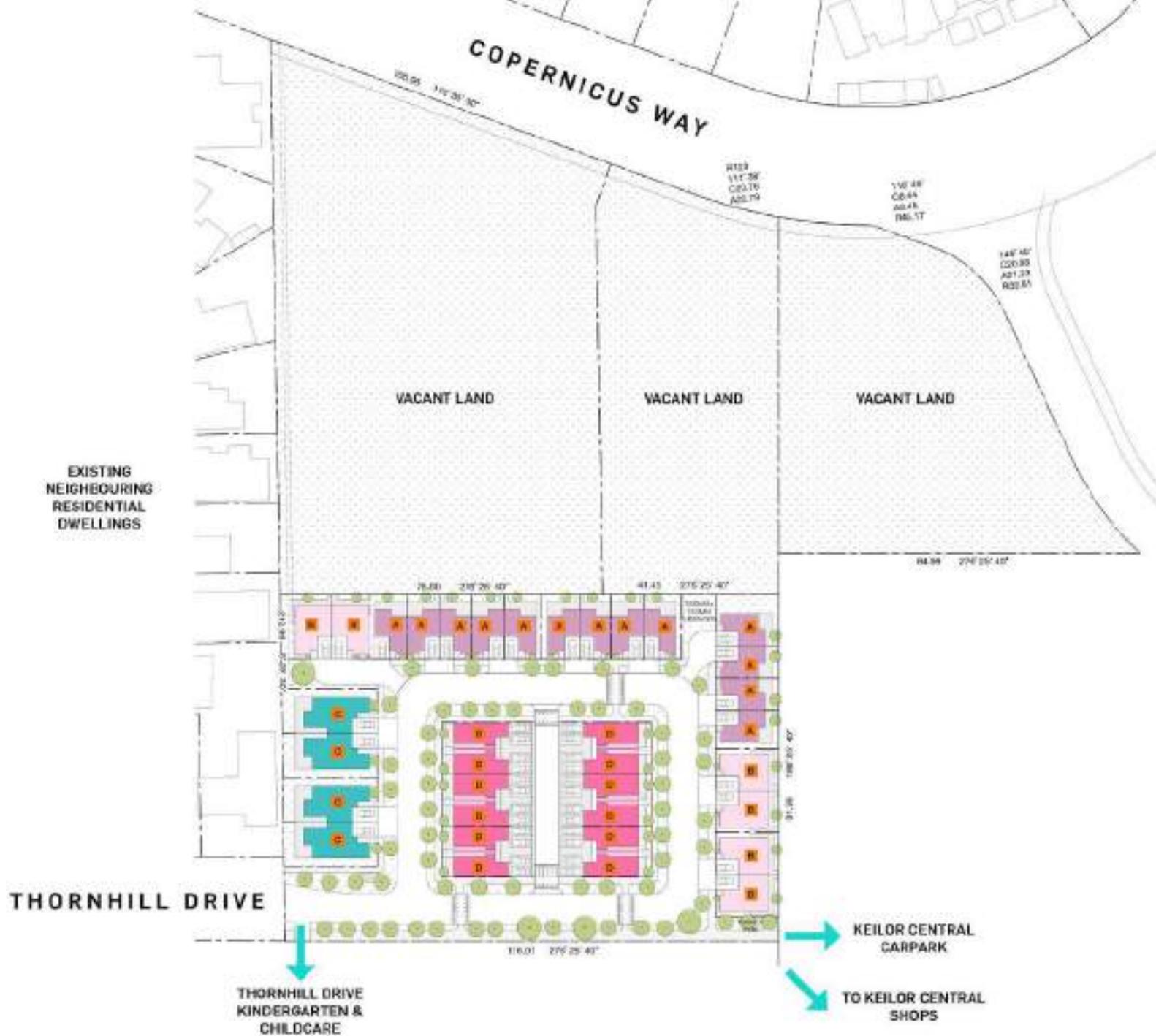


Engaging with Park Edges and
Local Context



Paths and Links Providing
Community Connections

PROPOSED OVERALL MASTERPLAN



Clarke
Hopkins
Clarke

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Baptcare
Affordable
Housing

PROPOSED GROUND FLOOR PLAN



Clarke
Hopkins
Clarke

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Bapte
Affordable
Housing

PROPOSED FIRST FLOOR PLAN



SINGLE STOREY UNITS

Type A

1 Bed, 1 Bath, 1 Carport
 13 Units
 117-136sqm Lot Area
 50sqm Unit



Type B

1 Bed, 1 Bath, 1 Carport
 5 Units
 134-188sqm Lot Area
 70sqm Unit



Type C

3 Bed, 2 Bath, 1 Carport
 4 Units
 223-238sqm Lot Area
 80sqm Unit



COMPLIANT WITH
 LIVABLE HOURS
 GUIDELINES



7 STAR NATHERS



5 STAR GREEN STAR

Clarke
 Hopkins
 Clarke

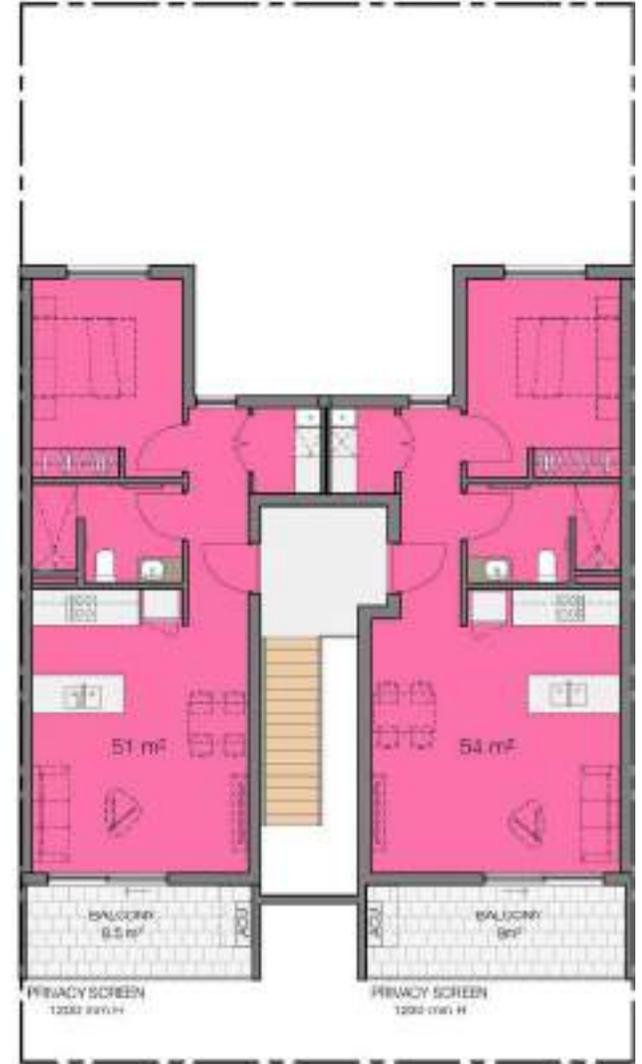
URBIS

Baptcare
 Affordable
 Housing

DOUBLE STOREY UNITS

Type D
 1 Bed, 1 Bath, 1 Carport
 12 Units
 121.5sqm Lot Area (Per Two Units)
 50sqm Each Unit

-  **GROUND FLOOR UNITS**
 COMPLIANT WITH LAKEBALE HOUSING GUIDELINES
-  **COMPLIANT WITH BETTER APARTMENT DESIGN STANDARDS**
-  **COMPLIANT WITH 7-STAR RATINGS**
-  **COMPLIANT WITH MCC**



1



Clarke
Hopkins
Clark

URBIS

Baptcare
Affordable
Housing

PLANNING PROCESS

Clause 52.20 – Victoria’s Big Housing Build

Clause 52.20 includes design standards similar to normal planning applications, including around site design, building design, landscaping, car parking, and amenity on site and off site.

FOUR STEP PROCESS

- 1** A draft proposal is put together by a project team including architects, planners, traffic engineers, landscape architects, stormwater and service engineers.
- 2** The draft proposal enters a community consultation period to gain feedback from the community, Council, Homes Victoria and the Department of Environment, Land, Water and Planning (DELWP).
- 3** The feedback is reviewed and incorporated into the draft proposal where appropriate. This is where submissions received from the community and Council will inform the final application pack.
- 4** The proposal is finalised and submitted to DELWP for review and a decision on behalf of the Minister for Environment, Energy and Climate Change.

HOW CAN YOU PARTICIPATE?

Provide written submission via email or post:



Phil Gleeson or Helen Allison,
Level 10, 477 Collins Street, Melbourne VIC 3000
03 8663 4888



pgleeson@urbis.com.au
hallison@urbis.com.au

Further information on the proposal can be accessed at.

<https://www.baptcare.org.au/services/housing/affordable-housing>

Submissions to be received by 25 October.



NEXT STEPS

Collation and assessment of submissions by BAH and the project team

Finalise and submit application to the Minister for Environment, Energy and Climate Change



QUESTIONS / DISCUSSIONS



APPENDIX G

SITE SIGN INFORMATION

NOTICE OF AN APPLICATION FOR PLANNING CONSENT

Consent is sought pursuant to Clause 52.20 – Victoria's Big Housing Build

| | |
|---|---|
| The land affected by the application is located at: | 21A Copernicus Way, Keilor Downs |
| The application is for: | Affordable housing development comprising the construction of 47 dwellings, including 23 single storey dwellings and 24 double storey dwellings. One car parking space will be provided for each dwelling. A new road is proposed to connect to Pinetree Crescent. |
| The applicant is: | Baptcare Affordable Housing |
| You may look at the application and any documents that support the application at: | www.baptcare.org.au/services/housing/affordable-housing Should you require physical copies of plans and supporting documents, please contact: Phil Gleeson – pgleeson@urbis.com.au Helen Allison – hallison@urbis.com.au Phone: 03 8663 4888 |
| An online information forum will be held on Tuesday 12th October between 6:00pm and 7:00pm . If you wish to attend, please contact Phil Gleeson or Helen Allison (contact details listed above) | |
| Any person who may be affected by the approval of this proposal may make a submission via: | |
| Post | Phil Gleeson or Helen Allison Urbis Olderfleet Building Level 10, 477 Collins Street Melbourne VIC 3000 |
| Email | Phil Gleeson – pgleeson@urbis.com.au Helen Allison – hallison@urbis.com.au |
| Online Submission | To be submitted to pgleeson@urbis.com.au or hallison@urbis.com.au |
| The closing date for submissions is: | 25 October 2021 |
| Following the conclusion of the consultation period, feedback will be considered and included in a report which will be submitted with the application to the Department of Environment, Land, Water and Planning. This report will detail how the feedback has been considered and any changes made to the proposal as a result. We note that as required by Homes Victoria, the feedback report will be made publicly available once a decision on this project is reached. | |

05.10.2021

From: Planning Notices R US <Info@planningnotices.com.au>
Sent: Tuesday, 5 October 2021 12:23 PM
To: Phil Gleeson
Cc: Chloe Laukart; Morgan McGannon; Nicholas Haselroither
Subject: RE: notice installed - 21a Copernicus Way, Keilor Downs
Attachments: Advertising - Photos - 21A Copernicus Way, Keilor Downs - install 1 / 1

Hi Phil,

Just confirming for you that the notice has now been erected for you at 21a Copernicus Way, Keilor Downs.

Kind regards,

Belinda Morcombe

Planning Notices R Us
Ph. 0407 840 329

www.planningnotices.com.au

From: Phil Gleeson <pgleeson@urbis.com.au>
Sent: Monday, 4 October 2021 8:36 AM
To: Planning Notices R US <Info@planningnotices.com.au>
Cc: Chloe Laukart <c.laukart@baptcare.org.au>; Morgan McGannon <mmcgannon@baptcare.org.au>; Nicholas Haselroither <nhaselroither@urbis.com.au>
Subject: Re: Baptcare Affordable Housing Consultation Package - 21a Copernicus Way, Keilor Downs

Hi Belinda

I hope you are well.

Can you please make sure the date on the notice is 3 weeks after the date of erection? If installed tomorrow, the date on the notice will then be 25th October.

Cheers

Phil Gleeson
Director
0410 599 902

From: Planning Notices R US <Info@planningnotices.com.au>
Sent: Friday, October 1, 2021 1:36 pm
To: Phil Gleeson
Subject: RE: Baptcare Affordable Housing Consultation Package - 21a Copernicus Way, Keilor Downs

All good Phil,

We have refunded Chloe and have just received the sign and instructions from Brimbank so the sign will be installed on Tuesday.

