10 May 2019

Ms Alix Rhodes
Executive Director Outer Melbourne
Victorian Planning Authority
Level 25, 35 Collins Street
MELBOURNE VIC 3000

Dear Ms Rhodes

Amendment C201 – Mount Atkinson and Tarneit Plains Infrastructure Contributions Plan – Increase to Supplementary Levy Amount

Thank you for the opportunity to comment on the VPA's Recommended Changes to the Panel documentation associated with Amendment C201 to the Melton Planning Scheme - the Mount Atkinson and Tarneit Plains Infrastructure Contributions Plan.

Please refer to the copy of the submission, which is attached.

Should you have any questions about the submission please contact



Att. Melton City Council submission to the Mount Atkinson and Tarneit Plains ICP – VPA recommended changes to the Panel.

A thriving community where everyone belongs

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Melton Library and Learning Hub 31 McKenzie Street Melton VIC 3337

Caroline Springs Library and Learning Hub 193 Caroline Springs Blvd

Caroline Springs VIC 3023

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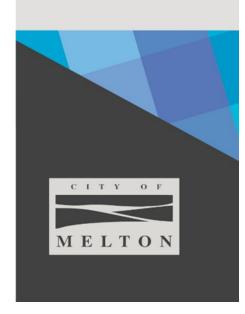
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A Thriving Community Where Everyone Belongs



C201 Mt Atkinson and Tarneit Plains Infrastructure Contributions Plan

Submission by Melton City Council on VPA recommended changes to the Panel, 10 May 2019

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1. Introduction

The City of Melton welcomes the opportunity to comment on the revisions prepared by the Victorian Planning Authority to the Infrastructure Contributions Plan, which recommend changes to Planning Scheme Amendment C201. Council officers have prepared a response to the following documents:

- 1. Mt Atkinson and Tarneit Plains Infrastructure Contributions Plan, April 2019 (VPA Recommended Changes to the Panel); and
- 2. Planning Scheme Ordinance including Infrastructure Contributions Overlay Schedule 3.

Melton City Council acknowledges the work that the Victorian Planning Authority (VPA) has undertaken to revise the documentation associated with this Infrastructure Contributions Plan (ICP).

Melton City Council has had the cost estimates for the infrastructure projects peer reviewed to ensure that they are reasonable and reflective of the actual construction costs.

This submission recommends changes that should be made to Mt Atkinson and Tarneit Plains ICP and Ordinance related to C201.

2. Key Issues

There are a number of key issues which need to be considered and addressed prior to Melton City Council (MCC) providing support for the amendment. These are issues that are considered to have a significant impact on MCC's ability to implement the PSP and the ICP.

2.1 Discrepancies with the approved Precinct Structure Plan

Many of the discrepancies between the proposed Infrastructure Contributions Plan (ICP) and the approved Mt Atkinson and Tarneit Plains Precinct Structure Plan (PSP), which Council had identified in its submission (October 2018) have been addressed in the proposed revisions to the ICP.

Council has prepared a comparison table (**Table 1**), which identifies:

- the issues that Council had identified in October 2018;
- the changes to the documentation that Council requested in October 2018; and
- whether the VPA Recommended Changes to the Panel document has addressed Council's previous concerns.

Table 1 illustrates that there are still some discrepancies between the proposed Infrastructure Contributions Plan (ICP) and the approved Mt Atkinson and Tarneit Plains PSP. The PSP constitutes the strategic justification for the ICP. The information in the ICP and the PSP should be consistent in language and content.

Council has reviewed the *VPA Recommended Changes to the Panel* document, and has identified a number of discrepancies between the wording in the revised ICP and the approved PSP as outlined in **Table 2**.

In particular, Council is still concerned that a number of the project descriptions in the ICP do not match the project descriptions in the PSP.

Given that the PSP is an incorporated document in the Melton Planning Scheme, Council requests that information in the ICP and the PSP be the same.

2.2 Transport Construction Project Costs

Melton City Council has undertaken a review of the transport projects in the Mt Atkinson and Tarneit Plains ICP. The review has found that whilst many of the projects have been identified as being benchmark projects, the Functional Layout Plans in the ICP for these projects are bespoke designs, and therefore should have be costed based on those designs.

The VPA have revised the cost estimates for transport construction projects. Council has prepared a comparison table (**Table 3**), which identifies:

- the original cost estimate for infrastructure projects in the original ICP;
- the original peer review cost estimate prepared for Council (October 2018);
- the revised cost estimate in the VPA Recommended Changes to the Panel document;
- the difference between the peer review estimate and the VPA's revised cost estimate;
 and
- the percentage difference between the peer review estimate and the VPA's revised cost estimate.

Council continues to request that the cost estimates prepared by WT Partnership are used for the ICP.

WT Partnership's review has found that the transport projects apportioned to the Mt Atkinson

and Tarneit Plains ICP will cost \$120,071,318 to deliver, whereas the VPA have estimated the revised delivery cost at \$113,357,760. This results in a difference of \$7,632,580 in the value of the transport projects.

The standard levy for Transport Construction in the ICP is \$114,062 per hectare which raises \$103,412,031. The standard levy has a shortfall of \$16,659,287 which should be covered by the supplementary levy.

The supplementary levy would need to be raised from \$10,743 per net developable hectare proposed by the revised version of C201 to \$18,375 per net developable hectare to cover the construction of the basic and essential transport projects.

Council has engaged WT Partnership to review the revised transport project construction estimate costs. WT Partnership will be preparing expert evidence on the revisions to the revised estimate costs, and Council will use the upcoming enclave to resolve the differences in value between Council's project cost estimates and the VPA's revised cost estimates for transport projects.

2.3 Community and Recreation Construction Levy

Melton City Council raises concerns with the current capped rate for the Community and Recreation Construction levy.

Exhibited ICP Project Cost Estimates

Using the Community and Recreation Project Costs in the revised ICP the community and recreation projects in the Mt Atkinson and Tarneit Plains ICP area will cost \$57,839,000 to deliver, and Council will collect \$35,567,313 from the Community and Recreation Construction levy to fund these projects, which results in a shortfall of \$22,271,687. The levy will collect 61.5% of the money required to construct essential community and recreation infrastructure. This percentage is less than what is currently collected for community and recreation infrastructure in approved DCP's in the City of Melton.

Peer Review Project Cost Estimates

The VPA have used benchmark costs for the Level 1 and Level 2 Community Centres, and have developed bespoke costs for the active open space reserves (and pavilions).

The VPA have revised the cost estimates for the community and recreation construction projects. Council has prepared a comparison table (**Table 3**), which identifies:

- the original cost estimate for infrastructure projects in the original ICP;
- the original peer review cost estimate prepared for Council (October 2018);
- the revised cost estimate in the VPA Recommended Changes to the Panel document;
- the difference between the peer review estimate and the VPA's revised cost estimate;
 and
- the percentage difference between the peer review estimate and the VPA's revised cost estimate.

Using the figures prepared by Turner and Townsend the community and recreation projects in the Mt Atkinson and Tarneit Plains ICP area will cost \$57,418,000 to deliver, and Council will collect \$35,567,313 from the Community and Recreation Construction levy to fund these projects, which results in a shortfall of \$21,850,687. Based on the Turner and Townsend figures, the levy will collect 62% of the money required to construct essential community and recreation infrastructure. This percentage is less than what is currently collected for community and recreation infrastructure in approved DCP's in the City of Melton.

The cumulative community and recreation construction shortfall for Mt Atkinson and Tarneit

Plains, and the Kororoit and Plumpton PSP areas is \$57,830,894.

Council is concerned that the value of the active open space reserves have decreased from the exhibited version:

Project	VPA exhibited estimate	Turner & Townsend exhibited estimate	VPA revised estimate	Difference	%
OS01	\$ 14,655,000	\$ 12,872,000	\$ 12,011,000	-\$ 861,000	-7%
OS02	\$ 10,347,000	\$ 11,042,000	\$ 9,677,000	-\$ 1,365,000	-12%
OS03	\$ 14,667,990	\$ 12,872,000	\$ 12,011,000	-\$ 861,000	-7%

Council is concerned that 10 hectare active open space reserves OS01 and OS03 values have decreased in value considerably (a drop in value of 18%), with these reserves being reduced by \$2.6 million each. Previously Council had not made a submission to revise the values as the cost estimates for OS01 and OS03 were greater than Council's estimates. It is unclear why the construction estimate of these works have reduced by 18%.

Council is concerned that the 6 hectare active open space reserve has further decreased in value, originally OS02 was within 10% of Council's estimate (-6.7%). We are concerned that OS02 has gone from -6.7% to -12%. Consideration should be given to retaining the previously exhibited value of this project.

Council continues to request that the cost estimates prepared by Turner and Townsend are used for the ICP.

Council requests the Department of Environment, Land, Water and Planning (DELWP) work with the Victorian Planning Authority and Growth area Councils to review the cost of delivering essential community infrastructure as part of the benchmark cost document being prepared by the VPA to ensure that the levy is fair and reasonable, and appropriate to deliver this essential infrastructure.

Council notes that it is currently exploring mechanisms and delivery models to help manage the funding contribution it makes to the delivery of infrastructure. However, there is a concern that an overall increased shortfall is unmanageable for Council particularly in a rate capping environment.

2.4 Mt Atkinson Indoor Recreation Centre

The previous Ministerial Direction released on 20 October 2016, allowed for the purchase of land for an *indoor sports facility* in Section 21, Table 5 of the Direction.

In the revised Ministerial Direction released on 2 July 2018, an *indoor sports facility* is no longer listed as a *public land allowable item*. Council has sought clarification from the VPA on this matter, and they have been informed by DELWP that the removal of this was an error and it will be reinstated as a *public land allowable item* in a future update of the Ministerial Direction.

Based on the information provided by DELWP to the VPA, we request that the indoor sports facilities remain as public land allowable items in the ICP (or are otherwise caught up by the remaining provisions). We request that the Ministerial Direction error to be rectified by DELWP prior to the ICP being approved and gazetted.

Should the Ministerial Direction not be updated prior to the gazettal of the ICP, it will result in difficulties for Council when negotiating the acquisition of land with landowners.

Council notes that a similar problem existed with Amendment C195 to the Melton Planning Scheme, the Kororoit and Plumpton Infrastructure Contributions Plan. We note that the Planning Panel for Amendment C195 recommended a clause be added to the Kororoit and Plumpton ICP to address this matter. The clause should:

- a) Note that the Minister exempts the Infrastructure Contributions Plan from complying with Table 7 of Annexure 1 in respect of the Plumpton Aquatics Centre.
- b) State that the exemption has been granted on the basis that 'land for indoor sports facilities' was unintentionally excluded from the Ministerial Direction when it was revised as a result of the commencement of the *Planning and Environment Amendment (Public Land Contributions) Act 2018.*
- c) Confirms that the Precinct Structure Plan specifies that the relevant land is to be set aside for the purposes of 'indoor sports facilities'.

We request that a similar clause be added to the Mt Atkinson and Tarneit Plains ICP. We note that the *VPA Recommended Changes to the Panel* document does not include this wording.

2.5 Implementation of the Infrastructure Contributions System

Melton City Council is concerned that there is still a lack of clarity on how the new Infrastructure Contributions system will operate, particularly how Councils are expected to implement the changes to public land contribution system. It is difficult to evaluate the appropriateness of the ICP in the absence of the Ministerial Direction as consistency with this direction is a key evaluative tool. For example, in relation to land credits and payment the note to the new Section 46GW states 'The method for calculating the land credit amount is specified in a Minister's direction applying to the approved infrastructure contributions plan'. Council reserves its position in this regard.

Council notes that the revised documentation prepared by the VPA includes new content on land contribution including a new land area 'contribution land' (the land in the ICP plan area in respect of which an infrastructure contribution is to be imposed under the plan if any of the land is developed. This land excludes encumbered land, existing public purposes land and land that is exempt from paying a contribution). It is unclear what items in the Parcel Specific Land Use Budget in Table 18 are included or excluded to derive the value in the 'Total Contribution Land' column.

Council seeks clarification on how the Infrastructure Contributions System will operate for the following matters:

- Is the new methodology for land contribution, including the new land area 'contribution land' in accordance with the current Ministerial Direction?
- Will the Ministerial Direction need to be updated to accommodate the new methodology for land contributions?
- Table 18 would be improved if it clearly identifies what land use elements have been included and excluded to derive the value in the 'Total Contribution Land' column.

3. Detailed Comments and Recommended Changes

In addition to the issues and recommendations outlined in Section 2 of this submission, the following tables provide detailed comments on the draft documentation and recommended changes to each document which forms part of the C201.

- 1. Infrastructure Contributions Plan Has the *VPA Recommended Changes to the Panel* Document Addressed Matters Raised in Council's Previous Submission?
- 2. Infrastructure Contributions Plan Comments on the VPA Recommended Changes to the Panel Document
- 3. Infrastructure Contributions Plan Comments on the revised values of infrastructure projects in the *VPA Recommended Changes to the Panel* Document

Table 1: Infrastructure Contributions Plan – Has the VPA Recommended Changes to the Panel Document Addressed Matters in Council's Previous Submission?

Item No.	Exhibited Section, Page no.	Exhibited Version – Council Comments (October 2018)	Exhibited Version - Recommended Change by Council (October 2018)	Has the Recommended Changes to the Panel addressed Council's previous concerns?
1	General Comment	The wording in the Mt Atkinson PSP and the ICP should match, this includes information in the project descriptions, and the staging of projects.	VPA make changes to ensure that the information in the PSP and the ICP match. (Refer section 2 of this submission for detail)	Partially Resolved
	Section 2.2	Planning and Environment Act 1987		
2	p.5	Incorrect reference made to Clause 45.10 to the Infrastructure Contributions Overlay	Change reference to the Infrastructure Contributions Overlay from Clause 45.10 to Clause 45.11	Resolved
	Table 5	Monetary Component Standard Levy Transport Projects		
		Road Projects		
3	p.12-13	The staging for road projects RD-01, RD-02, RD-04, RD-05, RD-07, RD-08, RD-11, and RD-12 do not match the staging in the approved PSP.	VPA make changes to ensure that the information in the PSP and the ICP match.	Resolved
4	p.12-13	The project description for road project RD-01 does not match the description of this project in the approved PSP.	Change the description of this road project to match the description in the approved PSP: Construction of a 2 lane carriageway, excluding intersections (interim treatment) within the existing Greigs Road reserve.	Unresolved
5	p.12-13	The project description for road projects RD-02, RD-03, RD-04, RD-05, RD-06, RD-07, RD-08, RD-09, RD-10, RD-11, and RD-12 do not match the description of these projects in the approved PSP.	Change the description of the road projects to match the description in the approved PSP: Construction of a 2 lane carriageway, excluding intersections (interim treatment).	Unresolved
		Intersection Projects		
6	p.14-16	The staging for intersection projects IT-03, IT-05, IT-07, IT-08, IT-13, and IT-16 do not match the staging of these projects in the approved PSP.	VPA make changes to ensure that the information in the PSP and the ICP match.	Resolved
		Bridge Projects		_
7	P.16	The staging for culvert project CU-01 does not match the staging for this project in the approved PSP.	VPA make changes to ensure that the information in the PSP and the ICP match.	Resolved
		Pedestrian Crossing Projects		
8	p.16	PS-02 the title of this project does not match the PSP.	Change the project title of PS-02 to match the PSP. The title should be Pedestrian Signals – Boulevard Connector Road .	Resolved
	Table 6	Monetary Component Supplementary Levy Transport Projects		
		Bridge and Culvert Projects		
9	p.17	The staging for culvert project CU-01 does not match the staging of this project in the approved PSP.	VPA make changes to ensure that the information in the PSP and the ICP match.	Resolved
	Table 7	Monetary Component Community and Recreation Projects		
		Community Building Projects		_
10	p.20	The staging for community building project CI-04 does not match the staging of this project in the approved PSP.	VPA make changes to ensure that the information in the PSP and the ICP match.	Resolved
		Recreation Projects		
11	p.21	The staging of recreation projects OS-02 and OS-03 do not match the staging of these projects in the approved PSP.	VPA make changes to ensure that the information in the PSP and the ICP match.	Resolved
	Plan 4	Public Land Provision		
12	p.23	Land is required for the provision of BR-02 (p.27), however this is not shown on Plan 4	Plan 4 should show project BR-02	Resolved
	Table 8	Public Purpose Land Component Projects		
4-	0.5	Road Projects	NOA L.	
13	p.25	The staging of road projects RD-02, RD-04, RD-05, RD-07, RD-08, and RD-11 do not match the staging of these projects in the approved PSP.	VPA make changes to ensure that the information in the PSP and the ICP match.	Resolved
		Intersection Projects		_
14	p.26-27	The staging of intersection projects IT-03, IT-05, 17-07, IT-08, IT-13, and IT-16 do not match the staging of these projects in the approved PSP.	VPA make changes to ensure that the information in the PSP and the ICP match.	Resolved
15	p.26-27	The project descriptions for intersection projects IT-02, IT-03, IT-04, IT-05, IT-06, IT-07, IT-08, IT-09, IT-10, IT-11, IT-12, IT-13, IT-14, IT-15 and IT-16 do not match the project descriptions of these projects in the approved PSP.	Simplify the project description of the intersection projects to read: Purchase of land for an intersection at an ultimate standard.	Resolved
4.0	n 27 20	Community and Recreation Projects The staging of community and regression projects CL04, OS 03, OS 03, OS 13	VDA make changes to ensure that the information in the DOD and the IOD watch	Doobled
16	p.27-28	The staging of community and recreation projects CI-04, OS-02, OS-03, OS-13, OS-19, OS-21, OS-25, OS-26, OS-31, OS-32, OS-33, and OS-36 do not match	VPA make changes to ensure that the information in the PSP and the ICP match.	Resolved
		the staging of these projects in the approved DSD		
	Section 5.9.1	the staging of these projects in the approved PSP. Temporary Works		

Item No.	Exhibited Section, Page no.	Exhibited Version – Council Comments (October 2018)	Exhibited Version - Recommended Change by Council (October 2018)	Has the Recommended Changes to the Panel addressed Council's previous concerns?
17	p.40	The Mt Atkinson ICP refers to Section 5.9.1 as <i>Temporary Works</i> , whereas the Plumpton and Kororoit ICP refers to it as <i>Interim and Temporary Works</i> . Council prefers the wording in the Plumpton and Kororoit ICP, as this is a more inclusive description.	Change the wording of section 5.9.1 to Interim and Temporary Works.	Resolved
	Table 17	Parcel Specific Land Use Budget		
18	p.52	The net developable area for property R5 in Table 17 in the ICP do not match the areas in Appendix A in the Mt Atkinson and Tarneit Plains PSP. The net developable area for R5 in Table 17 in the ICP is 3.24 hectares, whereas	VPA make changes to ensure that the information in the PSP and the ICP match.	Unresolved
		the PSP identifies 3.56 hectares.		
	Appendix 4	Infrastructure Elements		
19	p.63	IT-03 the ultimate kerb alignment of the intersection is not included.	IT-03 should be amended to include the ultimate kerb alignment.	Unresolved – the intersection design does not appear to have been changed
20	p.64	IT-04 the industrial road width in the ICP (29.0m) does not match the cross-section in the PSP (26.0m).	IT-04 should be amended to match the industrial road cross-section width in the PSP.	Unresolved – the intersection design does not appear to have been changed
21	p.65	IT-05 the secondary road width in the ICP (37.5m) does not match the cross-section in the PSP (34.0m).	IT-05 should be amended to match the secondary road cross-section in the PSP.	Unresolved – the intersection design does not appear to have been changed
22	p.69	IT-09 the secondary road width in the ICP (37.5m) does not match the cross-section in the PSP (34.0m).	IT-09 should be amended to match the secondary road cross-section in the PSP.	Unresolved – the intersection design does not appear to have been changed
23	p.69	IT-09 the connector road width in the ICP (33.3m – 31.0) does not match the cross-section in the PSP (31.0m – 28.0m).	IT-09 should be amended to match the connector road cross-section in the PSP.	Unresolved – the intersection design does not appear to have been changed
24	p.70	IT-10 the industrial connector road width in the ICP (25.0m) does not match the cross-section in the PSP (26.0m).	IT-10 should be amended to match the industrial connector road cross-section width in the PSP.	Unresolved – the intersection design does not appear to have been changed
25	p.71	IT-11 the industrial connector road width in the ICP (25.0m) does not match the cross-section in the PSP (26.0m).	IT-11 should be amended to match the industrial connector road cross-section width in the PSP.	Unresolved – the intersection design does not appear to have been changed
26	p.72	IT-12 the two secondary road widths in the ICP (37.5m) do not match the cross-section in the PSP (34.0m).	IT-11 should be amended to match the secondary road cross-section in the PSP.	Unresolved – the intersection design does not appear to have been changed
27	p.73	IT-13 the secondary road width in the ICP (37.5m) does not match the cross-section in the PSP (34.0m).	IT-13 should be amended to match the secondary road cross-section in the PSP.	Unresolved – the intersection design does not appear to have been changed
28	p.74	IT-14 the ultimate kerb alignment of the intersection is not included.	IT-14 should be amended to include the ultimate kerb alignment.	Unresolved – the intersection design does not appear to have been changed
29	p.75	IT-15 the secondary road width in the ICP (37.5m) does not match the cross-section in the PSP (34.0m).	IT-15 should be amended to match the secondary road cross-section in the PSP.	Unresolved – the intersection design does not appear to have been changed
30	p.76	IT-16 the ultimate kerb alignment of the intersection is not included.	IT-16 should be amended to include the ultimate kerb alignment.	Unresolved – the intersection design does not appear to have been changed

Table 2: Infrastructure Contributions Plan – Comments on the VPA Recommended Changes to the Panel Document

ltom	Revised	Revised Version – Council Comments	Revised Version - Recommended Change by Council
No.	Section,	Revised Version - Council Comments	Neviseu version - Neconiniended Change by Council
	Page no.		
1	General Comment	The wording in the Mt Atkinson PSP and the ICP should match, this includes information in the project descriptions.	VPA make changes to ensure that the information in the PSP and the ICP match.
	Table 5	Monetary Component Standard Levy Transport Projects	
	1 4.010 0	Road Projects	
2	p.10	The project description for road project RD-01 does not match the description of this project in the approved PSP.	Change the description of this road project to match the description in the approved PSP - Construction of a secondary arterial road (4 lanes) comprising 2 lane carriageway, excluding intersections (interim treatment) within the existing Greigs Road reserve.
3	p.10.11	The project description for road projects RD-02, RD-03, RD-04, RD-05, RD-06, RD-07, RD-08, RD-09, RD-10, RD-11, and RD-12 do not match the description of these projects in the approved PSP.	Change the description of the road projects to match the description in the approved PSP - Construction of a secondary arterial road (4 lanes) comprising 2 lane carriageway, excluding intersections (interim treatment).
		Bridge Projects	
4	P.14	Some of the bridge footnotes on page 14 do not relate to projects shown on this page	VPA to move the bridge footnotes to page 16.
	Table 7	Monetary Component Community and Recreation Projects	
	40	Community Building Projects	
5	p.18	The project description for community building project CI-02 is missing a word.	Change the description of this project to include a missing word - Construction of a Neighbourhood House Level 2 in the Mt Atkinson Major Town Centre, including youth space, additional classroom space and specialist facilities.
	Table 8	Inner Public Purpose Land	
		Community and Recreation Projects	
6	p.24	The project description for community building project CI-01 incorrectly identifies the name of the town centre.	Change the description of this project - Purchase of land for indoor recreation facility adjacent to the Mt Atkinson Specialised Major Town Centre
	Table 11	Public Purpose Land Credit and Equalisation Amounts	
7	p.28-33	The table does not include the header row on each page	Reformat the table to include the header row on each page
8	p.28-33	Some of the row values are spread over multiple lines	Reformat the table to ensure the row values are on one line
_	Table 12	Classes of Development and Standard Levy Rates	
9	p.35	The text below the table does not specify the table number	Change the text beneath Table 12 to read - Error! Reference source not found to Table 12
4.0	Section 5.13	Annual Indexation of Standard Levy Rates	1 0 ° 540 1
10	p.38	Section 5.13 references Table 11. Should it be Table 15?	In Section 5.13 change reference from Table 11 to Table 15.
4.4	Section 5.14	Annual Indexation of Supplementary Levy Rates Section 5.14 references Table 11. Should it be Table 15?	In Costian 5.44 shanga reference from Toble 44 to Toble 45
11	p.38 Table 17	Summary Land Use Budget	In Section 5.14 change reference from Table 11 to Table 15.
12	p.42	There is a spelling error in the table 'publis' instead of 'public'	Correct the spelling error in the table. Change publis to public
12	Table 18	Parcel Specific Land Use Budget	Correct the spenning error in the table. Change publis to public
13	p.44	There is a spelling error in the table 'publis' instead of 'public'	Correct the spelling error in the table. Change publis to public
14	p.50	The net developable area for property R5 in Table 17 in the ICP do not match the areas in Appendix A in the Mt Atkinson and Tarneit Plains PSP.	VPA make changes to ensure that the information in the PSP and the ICP match.
		The net developable area for R5 in Table 17 in the ICP is 3.24 hectares, whereas the PSP identifies 3.56 hectares.	
15	p.44-51	The table does not include the header row on each page	Reformat the table to include the header row on each page
16	p.44-51	Some of the column values are spread over multiple lines	Reformat the table to ensure the row values are on one line
	Appendix 4	Infrastructure Elements	
17	p.59	IT-03 the ultimate kerb alignment of the intersection is not included.	IT-03 should be amended to include the ultimate kerb alignment.
18	p.60	IT-04 the industrial road width in the ICP (29.0m) does not match the cross-section in the PSP (26.0m).	IT-04 should be amended to match the industrial road cross-section width in the PSP.
19	p.61	IT-05 the secondary road width in the ICP (37.5m) does not match the cross-section in the PSP (34.0m).	IT-05 should be amended to match the secondary road cross-section in the PSP.
20	p.65	IT-09 the secondary road width in the ICP (37.5m) does not match the cross-section in the PSP (34.0m).	IT-09 should be amended to match the secondary road cross-section in the PSP.
21	p.65	IT-09 the connector road width in the ICP (33.3m – 31.0) does not match the cross-section in the PSP (31.0m – 28.0m).	IT-09 should be amended to match the connector road cross-section in the PSP.
22	p.66	IT-10 the industrial connector road width in the ICP (25.0m) does not match the cross-section in the PSP (26.0m).	IT-10 should be amended to match the industrial connector road cross-section width in the PSP.
23	p.67	IT-11 the industrial connector road width in the ICP (25.0m) does not match the cross-section in the PSP (26.0m).	IT-11 should be amended to match the industrial connector road cross-section width in the PSP.
24	p.68	IT-12 the two secondary road widths in the ICP (37.5m) do not match the cross-section in the PSP (34.0m).	IT-11 should be amended to match the secondary road cross-section in the PSP.

	Revised Section, Page no.	Revised Version – Council Comments	Revised Version - Recommended Change by Council
25	p.69	IT-13 the secondary road width in the ICP (37.5m) does not match the cross-section in the PSP (34.0m).	IT-13 should be amended to match the secondary road cross-section in the PSP.
26	p.70	IT-14 the ultimate kerb alignment of the intersection is not included.	IT-14 should be amended to include the ultimate kerb alignment.
27	p.71	IT-15 the secondary road width in the ICP (37.5m) does not match the cross-section in the PSP (34.0m).	IT-15 should be amended to match the secondary road cross-section in the PSP.
28	p.72	IT-16 the ultimate kerb alignment of the intersection is not included.	IT-16 should be amended to include the ultimate kerb alignment.

Table 3: Infrastructure Contributions Plan – Comments on the revised values of infrastructure projects in the VPA Recommended Changes to the Panel Document

Transport Projects

Project	C	Original estimate	WT Partnership original estimate	VPA revised estimate		Difference	%
RD01	\$	1,047,490.00	\$ 1,366,216.00	\$ 1,356,250.00	-\$	9,966.00	-1%
RD02	\$	3,348,589.00	\$ 4,367,484.00	\$ 4,335,625.00	-\$	31,859.00	-1%
RD03	\$	520,366.00	\$ 678,701.00	\$ 673,750.00	-\$	4,951.00	-1%
RD04	\$	429,133.00	\$ 559,708.00	\$ 555,625.00	-\$	4,083.00	-1%
RD05	\$	351,416.00	\$ 458,343.00	\$ 455,000.00	-\$	3,343.00	-1%
RD06	\$	4,156,170.00	\$ 5,420,793.00	\$ 5,381,250.00	-\$	39,543.00	-1%
RD07	\$	2,311,236.00	\$ 3,014,490.00	\$ 2,992,500.00	-\$	21,990.00	-1%
RD08	\$	412,238.00	\$ 537,672.00	\$ 533,750.00	-\$	3,922.00	-1%
RD09	\$	1,142,102.00	\$ 2,278,496.00	\$ 1,478,750.00	-\$	799,746.00	-35%
RD10	\$	1,784,112.00	\$ 1,855,410.00	\$ 2,310,000.00	\$	454,590.00	25%
RD11	\$	1,422,559.00	\$ 1,855,410.00	\$ 1,841,875.00	-\$	13,535.00	-1%
RD12	\$	2,855,255.00	\$ 3,724,040.00	\$ 3,696,875.00	-\$	27,165.00	-1%
IN01	\$	6,684,000.00	\$ 8,862,599.00	\$ 9,310,000.00	\$	447,401.00	5%
IN02	\$	4,925,000.00	\$ 5,797,139.00	\$ 5,936,000.00	\$	138,861.00	2%
IN03	\$	3,940,000.00	\$ 4,831,842.00	\$ 4,972,000.00	\$	140,158.00	3%
IN04	\$	3,663,000.00	\$ 4,600,758.00	\$ 4,765,000.00	\$	164,242.00	4%
IN05	\$	4,384,260.00	\$ 3,335,125.00	\$ 3,372,000.00	\$	36,875.00	1%
IN06	\$	5,146,000.00	\$ 4,495,342.00	\$ 4,059,000.00	-\$	436,342.00	-10%
IN07	\$	4,384,260.00	\$ 3,186,801.00	\$ 3,270,000.00	\$	83,199.00	3%
IN08	\$	4,384,260.00	\$ 3,304,759.00	\$ 3,428,000.00	\$	123,241.00	4%
IN09	\$	4,384,260.00	\$ 3,186,813.00	\$ 4,042,000.00	\$	855,187.00	27%
IN10	\$	4,384,260.00	\$ 4,219,799.00	\$ 4,088,000.00	-\$	131,799.00	-3%
IN11	\$	4,384,260.00	\$ 5,369,469.00	\$ 5,052,000.00	-\$	317,469.00	-6%
IN12	\$	5,146,000.00	\$ 5,240,095.00	\$ 4,859,000.00	-\$	381,095.00	-7%
IN13	\$	4,384,260.00	\$ 4,785,172.00	\$ 4,818,000.00	\$	32,828.00	1%
IN14	\$	3,170,000.00	\$ 5,719,293.00	\$ 4,857,000.00	-\$	862,293.00	-15%
IN15	\$	4,384,260.00	\$ 3,489,954.00	\$ 3,627,000.00	\$	137,046.00	4%
IN16	\$	3,930,000.00	\$ 6,029,587.00	\$ 5,539,000.00	-\$	490,587.00	-8%
PS01	\$	276,614.00	\$ 276,614.00	\$ 276,614.00	\$	-	0%
PS02	\$	276,614.00	\$ 276,614.00	\$ 276,614.00	\$	-	0%
BR01	\$	7,678,564.00	\$ 7,678,564.00	\$ 7,678,564.00	\$	-	0%
BR02	\$	6,128,000.00	\$ 12,354,252.00	\$ 5,184,000.00	-\$	7,170,252.00	-58%
BR03	\$	938,000.00	\$ 541,399.00	\$ 1,005,000.00	\$	463,601.00	86%
CU01	\$	2,491,000.00	\$ 1,130,869.00	\$ 1,171,000.00	\$	40,131.00	4%
	\$	109,247,538.00	\$ 124,829,622.00	\$ 117,197,042.00	-\$	7,632,580.00	-6%

Community and Recreation Projects

Project	Original estimate		Turner & Townsend original estimate		VPA revised estimate		Difference		%
CI02	\$	7,648,000.00	\$	7,730,000.00	\$	8,928,000.00	\$	1,198,000.00	15%
CI03	\$	6,398,000.00	\$	6,451,000.00	\$	7,606,000.00	\$	1,155,000.00	18%
CI04	\$	6,398,000.00	\$	6,451,000.00	\$	7,606,000.00	\$	1,155,000.00	18%
OS01	\$	14,655,000.00	\$	12,872,000.00	\$	12,011,000.00	-\$	861,000.00	-7%
OS02	\$	10,347,000.00	\$	11,042,000.00	\$	9,677,000.00	-\$	1,365,000.00	-12%
OS03	\$	14,667,990.00	\$	12,872,000.00	\$	12,011,000.00	-\$	861,000.00	-7%
	\$	60,113,990.00	\$	57,418,000.00	\$	57,839,000.00	\$	421,000.00	1%

4. Conclusion

Melton City Council officers are generally supportive of the proposed infrastructure projects which accompanies the amendment documentation, however cannot provide full support of the ICP documentation itself until the issues and comments contained within this submission have been resolved. Of particular note are the following:

- The ICP should match the approved PSP. Council has identified a number of discrepancies including project descriptions, and land areas of projects;
- Council requests that the VPA use the cost estimates prepared by WT Partnership for transport construction projects that accompanied Council's submission in October 2018;
- The supplementary levy should be increased to \$18,375 per net developable hectare to cover the cost of constructing the transport projects;
- Council requests the VPA use the cost estimates prepared by Turner and Townsend for community and recreation construction projects;
- Review the arrangements relating to the Mt Atkinson Indoor Recreation Centre to add a clause that confirms that the land is required for the purpose of an indoor sports facility as per Amendment C195 (Plumpton and Kororoit Infrastructure Contributions Plan) to the Melton Planning Scheme; and
- Council seeks clarification on how the Infrastructure Contributions System will operate for the following matters:
 - Is the new methodology for land contribution, including the new land area 'contribution land' in accordance with the current Ministerial Direction?
 - Will the Ministerial Direction need to be updated to accommodate the new methodology for land contributions?
 - Table 18 would be improved if it clearly identifies what land use elements have been included and excluded to derive the value in the 'Total Contribution Land' column.

Council recommends that the Department of Environment, Land, Water and Planning work with the Victorian Planning Authority and Councils to review the Community and Recreation Construction Levy, given the shortfall between the money collected and the actual cost of delivery of this infrastructure. For the Mt Atkinson and Tarneit Plains ICP area only 62% of the money required for the construction of essential community and recreation infrastructure will be collected. It is worth noting that the cumulative community and recreation construction shortfall for Mt Atkinson and Tarneit Plains, and the Kororoit and Plumpton PSPs which are all under the ICP systems is \$57,830,894.