

Executive Summary

The landowner at 2 Judd Court Grangefields, NNROLE PTY LTD, makes this submission to the Melton East Precinct Structure Plan, associated DSS, and Planning Scheme Amendment C244melt to the Melton Planning Scheme.

Our client has reviewed the PSP and requests changes to the plan as exhibited, southwest client seeks a review of the proposal to place southwest the proposed P7-12 Secondary school on his site. For reasons detailed in this submission, our client seeks either the complete relocation of the school site or, as a secondary option, a revised layout option that sees the school site shifted to the west.

Further, our client seeks flexibility in the proposed density targets and housing typologies proposed on the site, given its proximity to the proposed NAC, local park and community facilities. The balance of residential area is not substantial and is not likely to support multiple typologies. The PSP does not substantiate this need in any detail

As outlined in the submission, the reasoning for these requests is as follows:

- A significant portion of the catchment for the P7-12 is located in the Warrensbrook area. It is submitted that the
 proposed 7-12 secondary school be located further to the southwest, more centrally within the Melton East
 Precinct, and more centrally to the surrounding primary school catchments for fairer accessibility and support.
- Alternatively, the school site should be shifted west as part of an overall 'fine grain' redesign of the northern
 area to address the draft PSP's proposal for irregular development parcels, on our client's site and others and
 to enable a more uniform 7-12 school parcel to be provided, promoting a more efficient design outcome.
- Locating a school site on multiple parcels is a commonly adopted approach in numerous PSPs.
- The size of the proposed school is also questioned, and it is requested that a reduction be considered to facilitate a more efficient use of land within this constrained part of the PSP.
- The housing typologies proposed are presented in the Affordable Housing Needs Assessment background document. Our client submits that the information presented in Table 2: PSP housing demand by number of bedrooms, including a supposed demand of 35% for one bedroom dwellings is completely unsubstantiated and not supported by any statistical assessment of housing delivery in nearby PSPs. Whilst there is an acknowledged need to provide additional social and affordable housing in all areas of Melbourne, such housing must be appropriate to particular areas and viable to construct
- Market viability for medium density one and two bedroom apartments, at scale, is not current possible and the current proposals would lead to the delayed full development of the PSP area

Figure 1: Site in context of draft Melton PSP



Subject Site and Surrounds

The subject site at 2 Judd Court, Grangefields is comprised of one parcel formally known as Lot 18 LP218298. The site comprised 12ha. There are no easements or restrictions on title, other than application of the MSA and GAIC to the land.

The 12-hectare site is irregularly shaped and developed with a dwelling in the east, a disused horse training track in the west, a dam in the south, and remnant farm infrastructure centrally. Access is via a driveway from Judd Court. The site is largely unconstrained. It is generally flat with minimal vegetation, aside from some planted trees near the house and scattered small trees and shrubs. There is no waterways present on the site. Surrounding lots are mostly rural living and agricultural, with some used for vehicle storage or commercial purposes. The site is 400m from Kororoit Creek, 4.6km from Rockbank Train Station, and 4.25km from Melton Town Centre, with good road connectivity via Melton Highway, Mount Cottrell Road, and Paynes Road.Title Particulars

Planning Controls

The site is within the Melton City Council and under the Melton Planning Scheme, the Urban Growth Zone (UGZ) applies, which manages the transition from non-urban to urban land under a precinct structure plan (PSP). As no PSP currently applies, agricultural uses are generally permitted if they do not prejudice future urban development. The site is within the Melton East PSP area, and a schedule will be added upon PSP finalisation to guide development.

The site is largely unconstrained, with no identified areas of Aboriginal Cultural Heritage Sensitivity, meaning a Cultural Heritage Management Plan (CHMP) is not required. While the site is within a Bushfire Prone Area (BPA), this designation may be removed as surrounding urban development reduces bushfire risk. The site has good transport access via Mount Cottrell Road, connecting to Melton Highway and the Western Freeway. Vegetation appears limited, though habitat compensation levies apply for the Golden Sun Moth under the Melbourne Strategic Assessment (MSA).

Property Details	
Address	2 Judd Court, Grangefields
Formal Description	Lot 18 LP218298
Municipality	Melton City Council
Site Area (approx.)	12 ha
Zoning	Urban Growth Zone
Overlays	-
Area of Aboriginal Heritage Sensitivity	No
Bushfire Prone Area	Yes
Growth Area Infrastructure Contributions	Yes
Melbourne Strategic Assessment Area	Yes

Figure 2: Extract of Plan of Subdivision



Figure 3: Subject Site and Surrounds (Source: Metromap – 14 March 2025)





Strategic Context

Melton East Precinct Structure Plan (PSP)

The subject site is located in the northern portion of the Melton East PSP area. The Victorian Planning Authority (VPA) is leading the preparation of the PSP and Infrastructure Contributions Plan (ICP) for Melton East, in collaboration with Melton City Council, State Government agencies, service authorities, and landowners. Located 35km north-west of Melbourne's CBD, the 1,005ha precinct is bounded by Kororoit Creek, Western Freeway, Leakes Road, and Melton Highway. It aims to complement surrounding development with residential and commercial opportunities and includes Biodiversity Conservation Strategy conservation areas along Kororoit Creek.

The Melton East PSP sets out a framework for approximately 13,000 new homes, with an average density of 27 dwellings per net developable hectare (NDHa). Higher-density development is required near town centres and planned high-capacity public transport, where a minimum of 40 dwellings per hectare must be achieved. Other areas follow standard density requirements, with 30 dwellings per hectare in proximity to key amenities and 20 dwellings per hectare elsewhere.

A key feature of the PSP is its affordable housing mandate, requiring 12% of all new homes to be designated as affordable. This includes 2% for subsidised moderate-income market housing, with the remaining allocation as social housing. Half of these affordable homes are expected to be one-bedroom dwellings. However, given the PSP's proximity to schools, the suitability of such a high proportion of one-bedroom homes should be reconsidered.

Development within the PSP is constrained by a relatively low net developable area, accounting for only 50% of the total precinct. This is primarily due to conservation areas, water management infrastructure, and the protection of pre-European wetlands. Consequently, the PSP applies a supplementary levy of \$343,000 per hectare, alongside an Infrastructure Contributions Plan (ICP) charge of \$600,000 per NDHa, reflecting the high costs of essential transport infrastructure relative to the developable land.

Application of the draft PSP to 2 Judd Court

The Melton East PSP indicates that the site will be adjacent to a Neighbourhood Activity Centre to the northwest, a local park to the west, an Active Open Space to the south and a government primary school to the southwest. It indicates the subject site as appropriate for a government secondary school (comprising 8.40ha).

The proposed government secondary school land will be purchased in due course. Its location meets most PSP guidelines for schools where it has good visual and physical links to the neighbourhood activity centre across the road to the west. It is co-located with other recreational and educational assets and is easily accessible as it has a connector street on its western boundary with a proposed off-road 2-way bike path & pedestrian path. However, the PSP requires that Proposed school sites must have a minimum of two connector road frontages (three preferred), one of which must be a bus-capable connector road. All connector roads fronting school sites must be wide enough to simultaneously accommodate safe and efficient, however the proposed school on the subject site only has one connector frontage and does not meet this mandatory requirement, noting that the other road frontages are local residential streets.

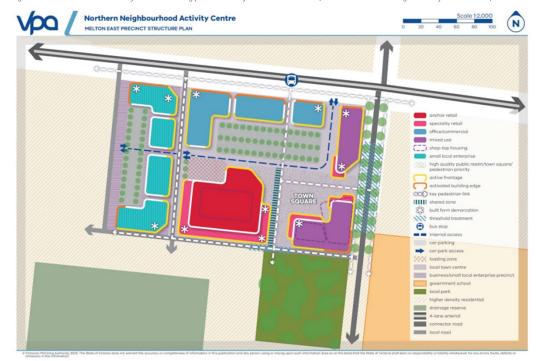
This site is identified (where not for a school and road) as an area of increased density, where 3.5ha of the site is net developable area. The subject site, by virtue of it being nominated in proximity to a NAC, should, according to the draft PSP, include affordable housing and a range of typologies. The proposed Clause 37.07 schedule 13 will apply the Residential Growth Zone 1 (RGZ1). The objectives of this zone support higher-density housing, including buildings up to four storeys, while promoting diverse housing types near services and transport. It seeks to create a transition between intensive and lower-density areas, ensure development meets design standards, and accommodate select non-residential uses that serve local community needs.

Table 3 and Table 4 of the PSP set out targets for density and affordable housing. Table 3 requires an average density of 40 dwellings per ha or more to be achieved by this site and up to 3 different housing typologies should be provided. The mix of dwelling typologies that the PSP states this site should include are: Integrated/apartment developments (though this typology is not defined) and attached multi-unit developments/townhouse developments. In particular it states that low to mid-rise developments should be prioritised around schools. A permit will not be required under Clause 2.5 of 37.07 schedule 13 for dwellings on lots less than 300sqm where a restriction applies the Small Lot Housing Code. A target of 12% affordable housing is required and Table 4 states that 2% of dwellings should be subsidised moderate income market housing and 9% should be social housing, with 1 bedroom dwellings making up the majority.

The Judd Court roadway is proposed as a Local Access Street (20m) as illustrated in the cross section below. A connector street is proposed to the western site boundary. Neither of these roads are ICP funded and will be delivered by the developer at their cost. Part of the intersection of the NS connector with is located within the site (IN-07) and the land (0.10ha) will be funded under the ICP. Streetscapes <u>must</u> achieve a minimum 30% canopy tree coverage.

An application will need to be supported by a Traffic Impact Assessment, hydrogeological assessment, drainage and integrated water management plan, stormwater strategy, landscape masterplan, affordable housing statement, sustainable design assessment, public infrastructure plan, PRSA, sodic and dispersive soils management plan.

Figure 4: Detail of Northern Activity Centre including portion of subject site in south east (Source: Victoria Planning Authority – March 2025)



Version: 1

Infrastructure Staging

There are no significant State-funded projects required to facilitate the development of the precinct.

The Precinct Infrastructure Plan, Plan 12, identifies projects as being delivered in the short term 0-5 years, medium term 5-15 years and long term 15+ years. This means that short term projects are Stage 1 projects, medium term projects are Stage 2 projects and long-term projects are those that can be delivered late in Stage 2.

The intersection IN-07 at Tarletons Road, which extends into the subject site, is required in Stage 1 (0-5 years) as is the delivery of this arterial. The development of the site however is nominated in Stage 2 of the PSP (5-15 years). Key infrastructure to be developed prior to development of this land includes major arterials (Tarletons Road and associated bridge access) to provide access to the central parts of the precinct, and drainage outfalls to the south of the site.

The DSS infrastructure in Stage 1 needs to be delivered to allow for DSS infrastructure abutting Kororoit Creek. The PSP does provide flexibility where interim solutions to drainage can be provided to Melbourne Water's satisfaction.

A key assumption for the staging plan is the delivery of some projects via Works in Kind (WIK) arrangements. If this is to occur, then developers will forward fund the cost of constructing the infrastructure and offset their future ICP monetary contribution. This assumption relies on developer eagerness and ability to deliver projects through WIK arrangements. This may be challenging in the north of the precinct, where landholdings are smaller and fragmented.

Figure 5: Local Road (20m) Cross Section (Source: Victoria Planning Authority- March 2025)

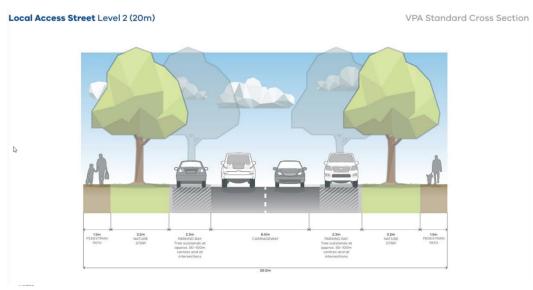
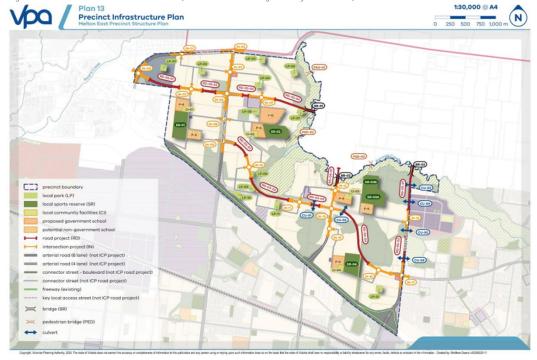


Figure 6: Melton East Precinct Infrastructure Plan (Source: Victoria Planning Authority– March 2025)



Version: 1

'Fine Grain' Development Arrangement

The northern section of the Melton East PSP, south of Tarletons Road includes a proposed Neighbourhood Activity Centre (refer extract Figure 4) combined with drainage and open space infrastructure, a P-6 school and a 7-12 school, active open space, a community facility and high amenity housing, connected via a mix of local and connector roads.

As shown in Figure 8, the proposed PSP layout in this area is not efficient or an example of high-quality urban design. The layout creates the following design issues:

- Irregular school shaped sites for both the P-6 and 7-12 school sites
- An interrupted traffic flow scenario created by the north south connector not appropriately aligned with the connector further south, leading to an unnecessary diversion in traffic flow, and delays
- Sub-optimal connectivity of the NAC with the adjacent community facilities
- A range of poorly configured development parcels on our client's site and the site to the west, south and south west. The development capability of these areas is important if the desired densities are to be achieved.

The opportunity exists to redesign this area in a more efficient manner to the benefit of all the landowners.

Figure 7: Detail of Melton East PSP Place Based Plan as if affects the subject site (Source: Victoria Planning Authority- March 2025)

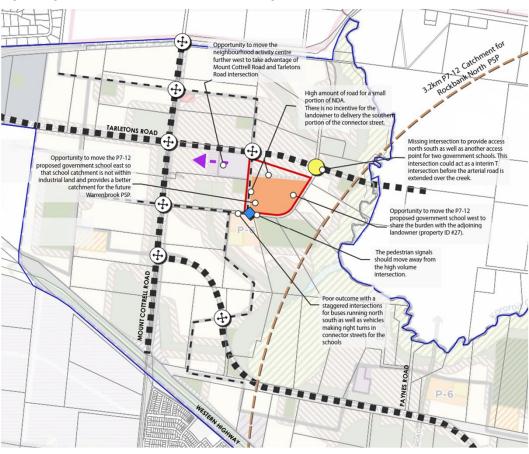


Justification for 7-12 School

As shown by the Plan in Appendix 1, the catchment area for the proposed 7-12 school extends approximately 3.4km to the east of the PSP, to a point approximately 2.7km into the Warrensbrook PSP.

It is also questioned the extent of land set aside for this school at 8.5ha.

Figure 8: Design review of Melton East PSP in northern area (Source: Beveridge Williams - March 2025)





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Submission to Draft PSP

The property at 2 Judd Court, Grangefields (Property ID #27) is proposed in the Melton East PSP to accommodate a government secondary school. For the reasons contained in this submission, our client seeks to have the school removed from their site entirely. Alternatively, if this is not possible, our client seeks to have the school relocated to the west, to share the burden with the adjoining landowner (Property ID #26) as part of the redesign of the area around the northern NAC.

Given the site's locational advantages abutting an activity centre and major transport routes and the national and statewide policy priority for housing delivery to meet the current housing supply crisis, our client seeks to maximise the site's Net Developable Area (NDA) for residential use. Further, with the school designated as a medium to long-term project and reliant on the establishment of a critical population within the adjoining Warrensbrook PSP (scheduled as a Horizon 3 project), much of the site will remain undeveloped until the school is actually needed. This represents a wasted opportunity to maiximise the delivery of housing at a time it is of critical shortage.

Further, our client seeks improved flexibility in the density targets and housing typologies that reflect the site's limited NDA and its proximity to key infrastructure.

Importantly, there are no major site impediments to development, and the site is well-positioned for residential use. Our client is seeking a residential land use outcome for the property, in line with the broader goals of the PSP to create sustainable and efficient communities.

School Site Designation

The draft Melton East PSP proposes a government secondary school on our client's site, where it is understood that the location of schools in the precinct have been planned in collaboration with the Department of Education, ensuring schools meet site selection criteria where possible whilst maximising accessibility to surrounding residential populations.

Anticipated delayed delivery of government secondary school

While we acknowledge these considerations, our client is concerned about the impact of the school designation on their land's Net Developable Area (NDA) and the long-term uncertainty surrounding its timing for delivery. The school is identified as a medium- to long-term project, contingent on population growth within the adjacent Warrensbrook PSP, a Horizon 3 project that is many years from commencement. As such, our client's land is expected to remain largely undeveloped until the school is required, restricting opportunities for efficient and earlier residential development. This is not an efficient outcome, nor does it address the critical need for more housing across all parts of Melbourne.

The VPA and Education Department should investigate a site in the future Warrensbrook PSP as an alternative school site location so that the school is delivered in a more appropriately timed manner, when the critical mass of population has established in the broader area. The site can then be developed for residential purposes to meet critical supply shortages.

Poor School Site Connectivity

The proposed government school site only has one connector frontage, whereas the PSP requires a minimum of two connector road frontages (with three preferred), one of which must be a bus-capable connector road. The remaining frontages are local residential streets, which may not be suitable for the volume of traffic generated by this large proposed school. This limited frontage will result in traffic congestion, safety concerns, and limited capacity for future school growth. It will also provide poor amenity for the residents adjacent to the school.

These concerns should be addressed to ensure that the school site is adequately connected to the wider transport network and that traffic flow is efficient and safe for both school and residential uses.

Proposed Alternative School Location

There is an opportunity to relocate the proposed 7-12 government secondary school further to the southwest to better centralise the school within the PSP area, noting that this current layout results in a significant part of its catchment being within the future Warrensbrook PSP area, and it not being ideally located with regards to accessibility to the Melton East catchment.

It is submitted that the PSP should propose a more suitable location within the Melton East PSP – specifically, south of Judd Court along Mount Cottrell Road and/or Paynes Road. This placement would improve accessibility for the two primary schools in the eastern part of the PSP while remaining within a reasonable distance of the other two proposed primary schools.

Affordable Housing and Housing Typology

The site is located within an area designated for increased density, with Table 3 of the PSP targeting an average density of 40 dwellings per hectare or more, with up to three different housing typologies to be provided. The mix of typologies proposed includes integrated/apartment developments and attached multi-unit developments/townhouses. However, the term "integrated" in the context of apartment developments needs further clarification.

Given the fragmented ownership of smaller lots and the limited NDA on the client's site due to the proposed school, achieving the required density and typology mix may prove challenging. In particular, low to mid-rise developments, which are prioritised around schools, are appropriate for the site. However, accommodating this within the available NDA may be difficult.

While the client supports the flexibility in the housing typology mix in G1, we question the PSP's requirement for 1-bedroom dwellings to constitute the majority of affordable housing. The site's proximity to a government school suggests that a higher proportion of larger dwelling typologies (such as 2- or 3-bedroom homes) may better suit the needs of families likely to be drawn to the area. This is especially pertinent considering the school will attract family-oriented demographics, and smaller units may not fully meet the local housing demand.

Additionally, the affordable housing target of 12% is supported as a guideline but should not be mandated. The breakdown of this target, as outlined in Table 4 of the PSP, includes 2% subsidised moderate income market housing and 9% social housing, with 1-bedroom dwellings comprising the majority. We recommend revisiting the target mix to ensure that it reflects the likely demand for larger family-oriented housing in this location.

Local Design Issues

In addition to the school location concerns, our client has identified several other issues related to the Draft Melton East PSP Urban Structure:

Intersections

The draft design includes staggered intersections for buses running north-south, as well as vehicles making right turns into connector streets for the schools. This configuration may result in operational inefficiencies and safety concerns.

The current placement of pedestrian signals at high-volume intersections could be reconsidered. Moving these signals away from such intersections would improve pedestrian safety and traffic flow.

The current plan omits an intersection to provide north-south access, which would be beneficial for both residential traffic and the two proposed government schools. This intersection could be designed as an interim T-intersection, serving as a connection until the arterial road is extended over the creek.

Neighbourhood Activity Centre (NAC) Location

We see an opportunity to move the NAC further west to take advantage of the Mount Cottrell Road and Tarleton Road intersection. This would provide better accessibility for residents and improve the potential for commercial development.

Incentive for Connector Street Delivery

The amount of road area proposed for a small portion of Net Developable Area (NDA) appears excessive. Reducing the road area could free up more space for development and improve land efficiency.

There is currently no clear incentive for the landowner to deliver the southern portion of the connector street. Providing this incentive would help unlock the full potential of the site and facilitate earlier development.

Stage 2 Development Timing and Delivery

The site is nominated within Stage 2 of the PSP and cannot be developed until the delivery of Stage 1 infrastructure, yet part of the site contains land required to deliver a Stage 1 intersection. It is unclear how the infrastructure asset will be delivered in full under that scenario.

The proposed staging arrangements therefore raise significant concerns about the timely delivery of the proposed government school and affordable housing on the client's site. It is submitted that the staging plan be reconsidered to include the NAC area and sites around it in Stage 1 to ensure the timely delivery of road, open space, educational and drainage infrastructure.



Submission to Draft PSP

Alternative Proposal and Justification

On behalf of our client, we have prepared an alternative concept plan that relocates the school site westward across the shared boundary of Property ID #27 and Property ID #26. This plan ensures:

- · Optimised road network efficiency whereby the revised layout removes staggered intersections, improves traffic flow, and creates a direct route for buses, school traffic, and residents.
- Earlier infrastructure delivery by shifting the north-south connector street further west, increases the likelihood of earlier road construction, as it will be located on larger properties with more NDA.
- Enhanced commercial frontage by reorienting the commercial area east-west to capitalise on Tarleton Road frontage and its intersection with Mount Cottrell Road, improving accessibility and commercial viability.
- Preservation of drainage function by carefully avoiding encroachment on the drainage reserve at Property ID #26, maintaining essential stormwater management functions.
- The local park is reconfigured to fit between the drainage reserve and connector street.
- The design results in more orderly shaped development parcels that will encourage higher density outcomes. High scale, efficiently delivered residential buildings rely on simplicity and uniform shapes for the best delivery results.
- The 7-12 school is presented in a more uniform and standard shape

We note that the delivery of a secondary school across multiple properties is commonplace in PSPs including the Plumpton PSP and the Kororoit PSP. The uniform shape of the school sites makes it more efficient to excise the sites from the two parcels. We note that the active open space is proposed to be delivered across multiple parcels in the immediate area.

Our client submits that, should the school not be relocated south of Judd Court along Mount Cottrell Road and/or Paynes Road, that this design change be adopted in the PSP as a significant improvement in the land use arrangements in the northern part of the PSP.

The plan is presented as Appendix 2.





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Summary and Conclusion

The property at 2 Judd Court, Grangefields (Property ID #27) is identified within the Melton East Precinct Structure Plan (PSP) as a proposed government secondary school site. While this location aligns with some PSP criteria, the landowner seeks to have the school removed from their site entirely. Alternatively, if this is not possible, the client requests the school be relocated west to lead to an improved land use arrangement.

Our client's primary objective is to maximise the Net Developable Area (NDA) for residential use, given the site's strategic location near key transport routes and the neighbourhood activity centre (NAC). With the school designated as a medium to long-term project and reliant on population growth within the adjacent Warrensbrook PSP (a Horizon 3 project), development on this site will be significantly delayed.

The provision of residential land as a priority is consistent with both federal and state government policies to ensure the provision of sufficient housing to address the housing supply crisis afflicting the country.

Further, the landwoner seeks flexibility in density targets and housing typologies to ensure a viable and sustainable residential outcome. Importantly, there are no major site impediments to development, reinforcing its suitability for residential purposes.

Key Concerns and Requested Amendments

1. School Site Designation and Connectivity

The draft PSP requires proposed school sites to have at least two connector road frontages (three preferred), one of which must be a bus-capable connector road. However, the proposed school at 2 Judd Court has only one connector road frontage, with other frontages being local residential streets. This does not meet PSP requirements and raises concerns regarding congestion, safety, and accessibility.

Requested Amendment: The school should be relocated west to Property ID #26 to improve transport integration and meet PSP connectivity requirements.

2. Staging and Delivery Delays

The site is designated within Stage 2 of the PSP, meaning development cannot proceed until key Stage 1 infrastructure is delivered. This affects both the timely delivery of the school and the affordable housing supply on the site.

Requested Amendment: The PSP should be amended to include the NAC and surrounding areas in Stage 1. Further the PSP should be amended to allow for greater flexibility in staging to prevent unnecessary delays in development, particularly where interim infrastructure solutions can be delivered.

3. Affordable Housing and Housing Typology

The site is designated for increased density, with an expected average of 40 dwellings per hectare and up to three different housing typologies. However, the PSP specifies that 1-bedroom dwellings should make up the majority of affordable housing. Given the site's proximity to a school, a higher proportion of family-sized dwellings (2-3 bedrooms) would be more appropriate to meet community needs in this location.

Requested Amendment: The PSP should revise the affordable housing mix for the site to prioritise larger dwelling typologies better suited for families in areas around schools.

4. Neighbourhood Activity Centre (NAC) Relocation

The current PSP places the NAC east of Mount Cottrell Road, but there is an opportunity to shift it further west to better align with the Tarleton Road intersection, improving accessibility and commercial viability.

Requested Amendment: The PSP should relocate the NAC further west for better integration with transport and commercial activity.

5. Canopy Tree Coverage Targets

The PSP mandates a minimum of 30% canopy tree coverage for streetscapes, and we support these targets. However, this requirement should be more site-responsive, allowing for lower targets where local conditions limit feasibility.

Requested Amendment: The PSP should include flexibility for canopy tree coverage based on site-specific constraints.

Alternative Proposal and Justification

We have prepared an alternative concept plan that relocates the school westward across the shared boundary of Property ID #27 and Property ID #26. This plan ensures:

- Optimised road network efficiency by eliminating staggered intersections and improving traffic flow for school traffic and residents.
- Earlier infrastructure delivery, as shifting the north-south connector street west increases the likelihood of timely road construction.
- Enhanced commercial frontage, with the commercial area reoriented to capitalise on the Tarleton Road and Mount Cottrell Road intersection.
- Preservation of drainage function, avoiding encroachment on the drainage reserve at Property ID #26.
- A reconfigured local park to improve integration with open space networks.
- More orderly shaped development parcels.
- A more orderly shaped 7-12 school parcel.

Conclusion and Formal Request

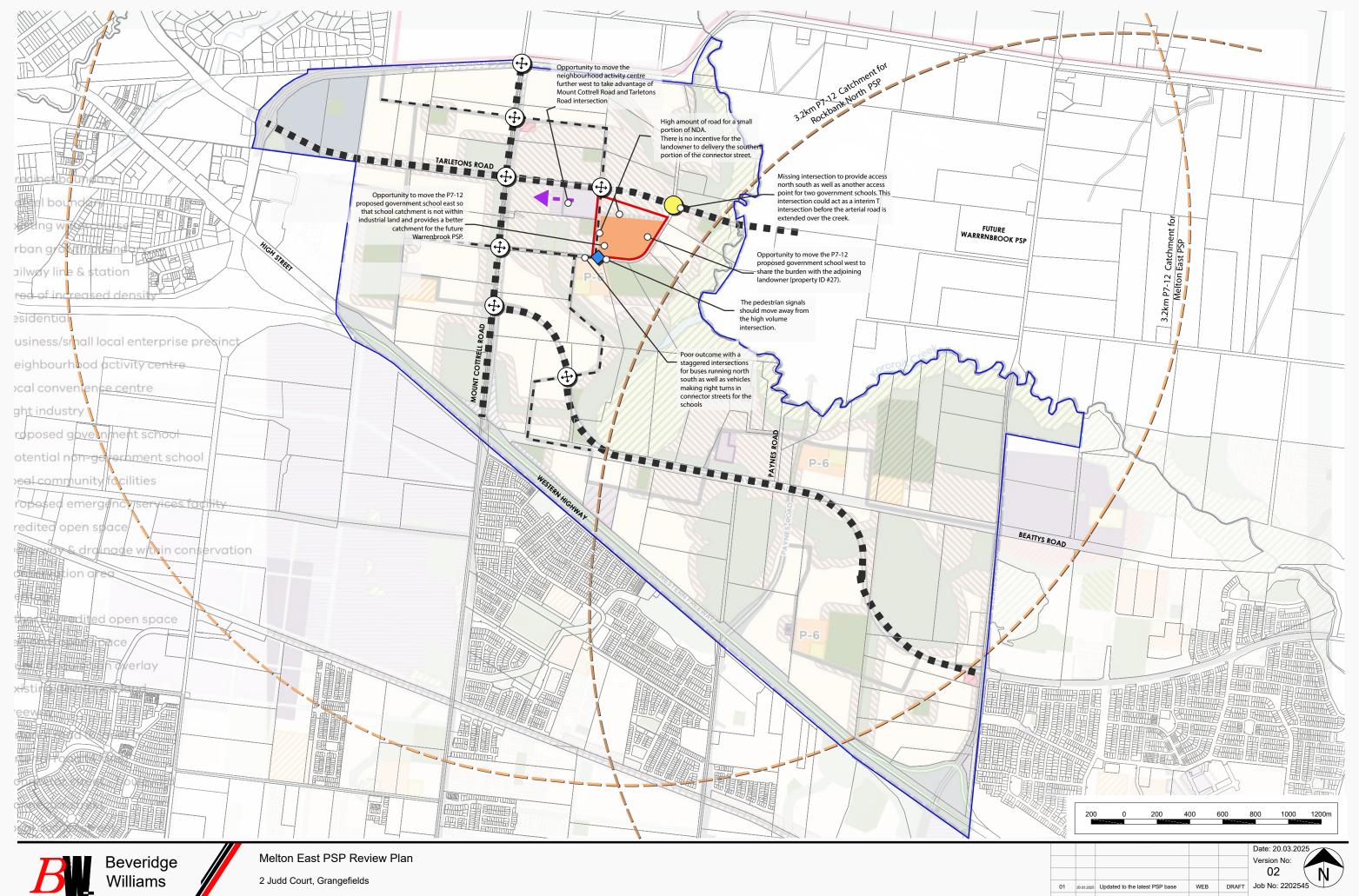
To ensure that the Melton East PSP supports efficient, sustainable, and well-integrated development, we respectfully request the following amendments:

- To consider another site for the secondary school that will be more centrally located and accessible to the four proposed primary schools in particular the two primary schools in the eastern part of PSP, and to the Melton East PSP catchment.
- Relocate the proposed school west to improve PSP connectivity regarding to traffic congestions, accessibility
 and safety around schools. In addition also to prevent undue burden on a single landowner.
- Redesign the land use arrangements around the NAC.
- Introduce greater flexibility in staging to facilitate timely development of housing and infrastructure.
- Revise the affordable housing mix to prioritise larger dwellings suited to the family-oriented demographic attracted to this area.
- Relocate the NAC further west to optimise commercial viability and accessibility.
- Provide flexibility in canopy tree coverage targets to ensure practical and site-responsive outcomes.

Implementing these amendments will enable the PSP to achieve its objectives while addressing key challenges related to infrastructure delivery, housing diversity, and urban structure. We urge the VPA to incorporate these modifications into the final PSP to support a balanced and effective planning outcome.



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NNLAE Pty Ltd

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