

Submission to

Melton East PSP & DSS

8 Judd Court, Grangefields

Client

Issued
31/03/2025



Executive Summary

The landowner at 8 Judd Court, Grangefields, [REDACTED] make this submission to the Melton East Precinct Structure Plan and Planning Scheme Amendment C244mel to the Melton Planning Scheme.

Our client has reviewed the PSP and requests changes to the plan as exhibited. In particular, our client is concerned with the proposed land use arrangements across their site and the unfair impost that the draft PSP proposals have on the development viability of the land.

Our clients seeks a review of the PSP with regard to:

- The equitable distribution of encumbrances, infrastructure and community facilities
- Infrastructure delivery and staging
- The relocation of the proposed local park
- A review of the extent of the Conservation Area
- A review of the drainage plan proposals
- A review of the proposed densities and housing typologies as they apply to the site
- A review of the Affordable housing mix
- An assessment of the financial viability of the Local Access Street

Further details of our client's requests are detailed in this submission.

Figure 1: Subject Site and Surrounds (Source: Metromap – 14/03/25)



Subject Site and Surrounds

The details of the subject site are as follows:

Property Details	
Address	8 Judd Court, Grangefields
Formal Description	Lot 12 LP218298
Municipality	Melton City Council
Site Area (approx.)	12.21 ha
Zoning	Urban Growth Zone (UGZ) Urban Floodway Zone (UFZ) Rural Conservation Zone – Schedule 1 (RCZ1)
Overlays	Environmental Significance Overlay – Schedule 2 (ESO2) Environmental Significance Overlay – Schedule 5 (ESO5)
Area of Aboriginal Heritage Sensitivity	Yes
Bushfire Prone Area	Yes
Growth Area Infrastructure Contributions	Yes
Melbourne Strategic Assessment Area	Yes

The subject site is an irregularly shaped parcel of 12.21 hectares. The site is developed with a single dwelling in the south-west part of the site and a shed in the south-east corner. Access to the site is from Judd Court found along the western boundary, with no paved path as a specific access point.

The site is generally flat and contains some vegetation having been largely cleared for agricultural and rural living use. Some trees can be observed around the house, and along the southern boundary. The Kororoit Creek runs through the eastern part of the property, where trees roughly line both its sides. Several small trees and shrubs are located elsewhere within the site.

The surrounding area comprises similarly sized predominantly rural living type allotments used for agriculture, though some lots are used for vehicle storage and other commercial purposes.

The Rockbank Train Station is approximately 8.3 km southeast. The Western Freeway is approximately 5 kilometres south of the site being a major link to inner Melbourne suburbs and Ballarat. The closest shopping precinct Melton Gateway is approximately 4.8 kilometres away.

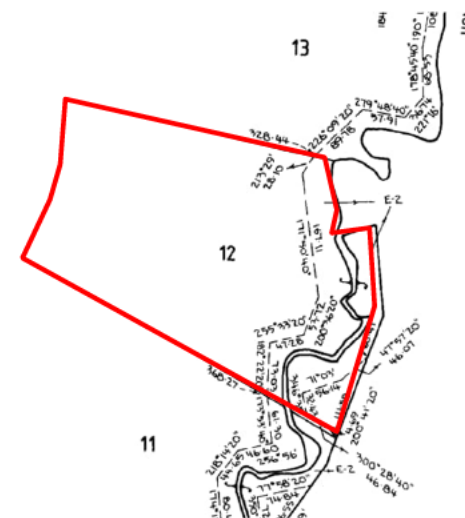
Title Particulars

The subject site at 8 Judd court, Grangefields is comprised of one parcel formally known as Lot 12 LP218298. The site comprises 12.21ha in 2 parts, divided by the creek. There are E-2 easements for drainage purposes on the title, which appear to align with the creek alignment.

Figure 2: Extract of Plan of Subdivision



Figure 3: Extract of Plan of Subdivision



Existing Planning Controls

The subject site falls within the Melton City Council municipality and is governed by the Melton Planning Scheme.

The Council's vision prioritises creating a vibrant, safe, and liveable city with strategic growth, environmental protection, and strong social and economic connections. Clause 02.03 outlines key strategic directions, including managing urban growth, enhancing biodiversity, mitigating climate change, supporting local employment, and ensuring well-planned infrastructure delivery.

The planning framework supports sustainable urban development while protecting non-urban land and culturally significant areas.

The Planning Policy Framework includes clauses addressing growth management, infrastructure provision, environmental protection, and housing diversity. Clause 11.01 promotes compact urban areas with integrated transport and services, while Clause 11.02 ensures a sufficient supply of land and coordinated infrastructure planning. Environmental considerations include waterway protection (Clause 12.03), landscape character retention (Clause 12.05), and floodplain management (Clause 13.03). Bushfire planning (Clause 13.02) and land contamination mitigation (Clause 13.04) are also prioritised. Housing policies under Clause 16.01 focus on diverse, well-designed, and affordable housing near jobs and services.

The current zone and overlay provisions are relevant as they identify the existing site conditions and shape our client's response to the PSP.

Clause 37.07 Urban Growth Zone

The site is predominately within the Urban Growth Zone (UGZ). The UGZ seeks to manage the transition of non-urban land into urban land in accordance with a precinct structure plan (PSP). As no PSP yet applies, the zoning facilitates generally agricultural uses where they do not prejudice the future urban development of the precinct.

The subject site is within the Melton East PSP area and a schedule will be added on finalisation of the PSP to facilitate development in accordance with the PSP.

Clause 35.06 Rural Conservation Zone

The eastern most part of the site is located within a Rural Conservation Zone (RCZ) which aims to conserve and enhance the cultural significance and character of the open rural landscapes. The schedule to the zone states that the conservation values in this location are to 'Protect and conserve vegetation, minimise erosion and soil degradation, protect and enhance water quality, protect native habitat and protect significant rural landscapes.'

Clause 35.06-5 requires a permit for buildings and works.

Clause 37.03 Urban Floodway Zone

Part of the site along the waterway edge is zoned Urban Floodway Zone (UFZ). The UFZ seeks To identify waterways, major flood paths, drainage depressions and high hazard areas within urban areas which have the greatest risk and frequency of being affected by flooding.

Clause 37.03-2 requires a permit to construct or carry out works. This includes a fence and roadworks, as well as underground services. A flood risk assessment will also need to be undertaken.

Clause 42.01 Environment Significance Overlay

The subject site is also affected by the Environment Significance Overlay Schedules 2 and 5 (ESO2 and ESO5). The ESO identifies areas where the development of land may be affected by environmental constraints and ensures that development is compatible with identified environmental values.

The ESO2 identifies Wetlands, Waterways and Riparian Strips (in this case Kororoit Creek) as being environmentally significant. It highlights the topography of the waterway as a highly distinctive feature of the landscape. The overlay aims to protect and conserve wetlands, riparian habitats, and native vegetation while discouraging inappropriate development. It seeks to maintain the natural topography and vegetation of waterways as key visual elements, safeguard views, and enhance the landscape setting of waterways, valleys, and gorges. Additionally, it promotes responsive building design and increased indigenous planting to strengthen habitat linkages and corridors.

ESO5 identifies the Rural Conservation Area where the creek environs are identified as a significant biodiversity asset that should be retained and where urban development is not appropriate. It highlights that these areas are retained and managed to ensure that their biodiversity values and any habitat links are protected and enhanced.

Figure 4: Zoning Map (Source: Vicplan – 2025)

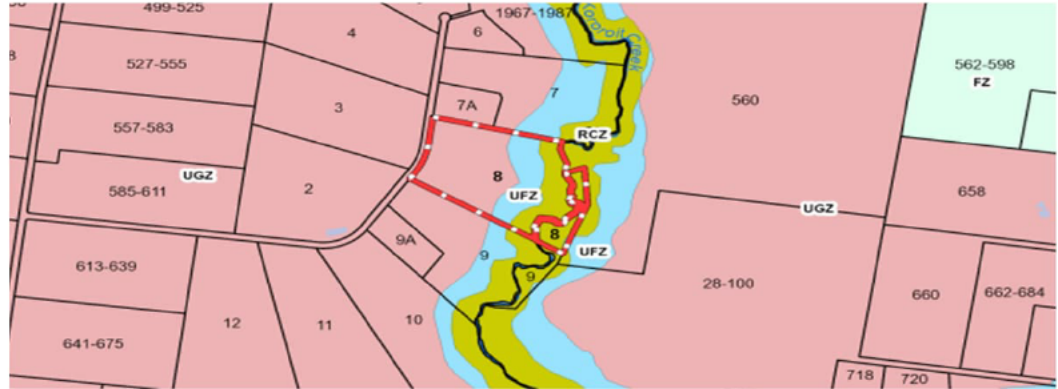


Figure 5: Growth Area Infrastructure Contribution Map (Source: Vicplan – 2025)



Figure 6: Environmental Significance Overlay Map (Source: Vicplan – 2025)



Other Environment and Land Considerations

Aboriginal Cultural Heritage

The site is located on the traditional lands of the Wurundjeri Woi Wurrung people, with the Wurundjeri Woi Wurrung Cultural Heritage Aboriginal Corporation serving as the Registered Aboriginal Party (RAP) for this area.

The site is identified as an area of Aboriginal Cultural Heritage Sensitivity and, as such, a Cultural Heritage Management Plan (CHMP) is required for any high impact activities on the site. A CHMP will be required prior to any works being undertaken on the site.

Bushfire Prone Area (BPA)

The entirety of the subject site is within a Bushfire Prone Area, as shown in Figure 7. It is a requirement under the Building Regulations that a building surveyor, or appropriately qualified Bushfire Consultant, prepare an assessment of the BAL rating appropriate for residential dwellings under BPA designation. We note that Bushfire Prone Areas are regularly reviewed, and the extent of BPA designation can change following urban development where the risk of bushfire is adequately reduced. Given the emerging residential development of the surrounding area, it may be possible to have this BPA designation removed.

Biodiversity

Based on aerial imagery, it appears that the majority of the site does not appear to contain much vegetation. It is noted that the site may contain native grasses, however no site vegetation assessment has been undertaken at this stage.

Under Victorian and Commonwealth law, clearing of native vegetation requires a planning permit, and must generally be avoided and minimised, and where unavoidable, losses must be compensated through offsets or habitat protection.

The subject site is located within an area that is subject to habitat compensation for the removal of native vegetation and habitat for certain threatened species under the Melbourne Strategic Assessment (MSA) (Figure 6). The MSA program is intended to create a more streamlined program for developer funded biodiversity offsets, with the levies raised to go towards conservation programs and nature reserves.

The subject site is identified as containing a conservation area of 5.165ha (shown black hatched in Figure 8). It is part of conservation area 15B, one of 36 conservation areas identified in the *Biodiversity Conservation Strategy for Melbourne's Growth Corridors* (BCS). The conservation area is not located in the MSA Levy Area and no levy applies to the part of the site set aside as a conservation area.

The balance of the site has a levy payable for habitat compensation for the Growling Grass Frog and Golden Sun Moth. Accordingly, payment of a levy will be required when developing the land. The levy liability for this site is currently estimated as \$146,909.17.

Figure 6: Melbourne Strategic Assessment Map (Source: Vicplan – 2025)



Figure 7: Bushfire Prone Area Map (Source: VicPlan – 2025)

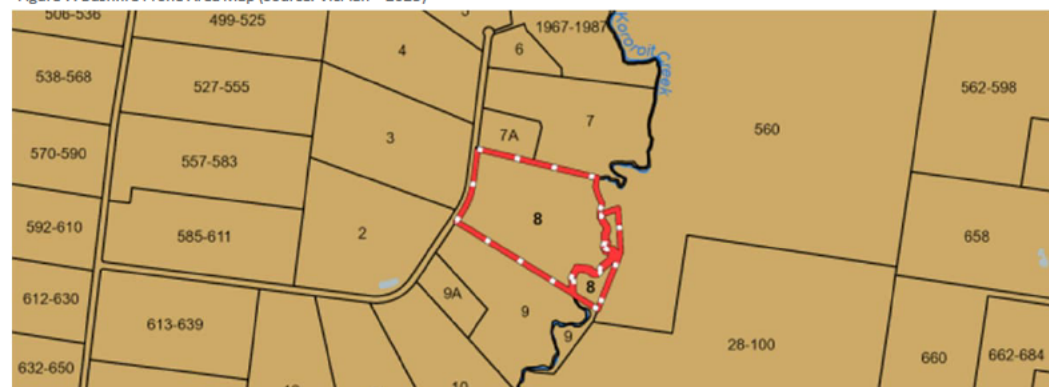
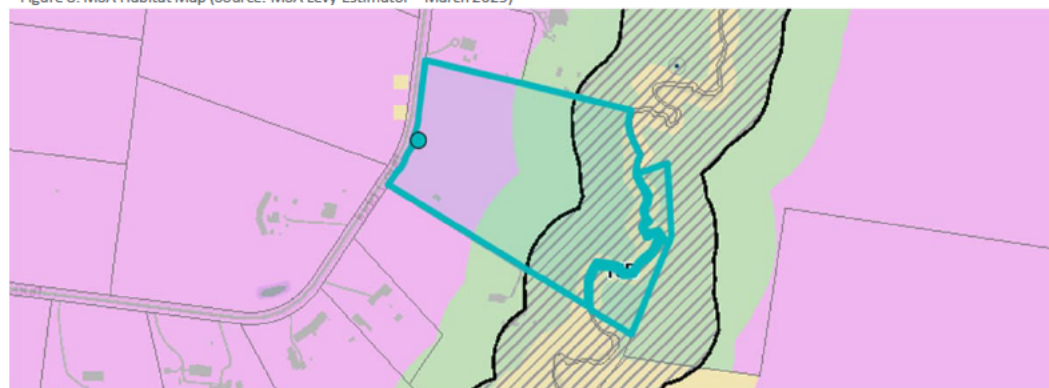


Figure 8: MSA Habitat Map (Source: MSA Levy Estimator – March 2025)



Strategic Context

West Growth Corridor Plan

The West Corridor Plan designates the subject site as future urban. More broadly, the West Growth Corridor Plan seeks to:

- Improve road, public transport and freight networks across the region;
- Extend the western industrial node, and connecting it to a new freight terminal and the broader transport network;
- Create a diversity of new communities, well serviced by public transport and with very high amenity by building on natural features such as regional parklands, creeks and waterways, and creating high quality town centres and urban areas;
- Create attractive and accessible locations for a wide range of jobs, investment, and services – including in six new higher order town centres.

Draft 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 vision is:

Melton East will be a sustainability-focused precinct delivering a network of walkable, safe and attractive neighbourhoods which leverage the natural beauty of the Kororoit Creek conservation area and wetlands. As an important piece in the Melton Economic Corridor located along the Western Freeway, the PSP will unite the surrounding precincts and key destinations, including Cobblebank Metropolitan Activity Centre, Aintree Major Town Centre and the Melton Township.

The draft Melton East PSP aims to create a vibrant, inclusive, and sustainable community with approximately 2,000 jobs and 12,908 dwellings. It focuses on blending the natural environment with modern urban living, conserving significant flora and fauna, and providing public open spaces and active transport routes. The plan supports diverse and affordable housing, walkable neighbourhoods, and local employment opportunities. It also emphasises climate resilience, integrated water management, and the conservation of key ecological resources like the Seasonal Herbaceous Wetland. The PSP includes strong community engagement, celebrating Aboriginal cultural heritage, and ensuring well-connected transport and infrastructure networks.

Key Features of the PSP

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.

The PSP is structured into two stages, with infrastructure and development required to align with Plan 12 to ensure services are delivered in a coordinated and timely manner. Additionally, the plan mandates that stormwater infrastructure and waterways be developed in accordance with Melbourne Water's requirements, with an emphasis on early establishment where possible.

Strong Environmentally Sustainable Design (ESD) principles underpin the PSP, including provisions aimed at mitigating the urban heat island effect through increased vegetation and the use of reflective materials. Streetscape design is also a key focus, with strict requirements for rear-loaded lots under 10.5 metres in width unless specific tree canopy and streetscape conditions are met. Laneways must not exceed 8 to 10 dwellings per side.

Integrated Water Management (IWM) is a major consideration, particularly for stormwater discharge into Biodiversity Conservation Strategy (BCS) conservation areas and protected wetlands. The PSP also outlines heritage protections, requiring the retention of dry-stone walls and encouraging voluntary Cultural Heritage Management Plans (CHMPs) in specific locations, in addition to mandatory CHMPs.

The PSP contains provisions that appear to exceed its legal scope, particularly in relation to ongoing land management requirements on public land. These provisions seem to extend bushfire management obligations from the Bushfire Management Overlay (BMO) into areas that will not be classified as bushfire-prone once developed. A more practical approach to bushfire risk management should be considered, particularly for locations that do not adjoin the Urban Growth Boundary (UGB). Additionally, approximately 40% of the precinct is subject to acoustic requirements aimed at reducing noise impacts for future residential areas near the Western Freeway and other major arterial roads.

Figure 9: Melton East PSP Place Based Plan (and subject site) (Source: Victoria Planning Authority– March 2025)



Application of the draft PSP to 8 Judd Court

The Melton East PSP nominates the land for a wide range of future land uses, which heavily constrain and limit the development potential of the site. The land is identified as property #28, and within which land is set aside for:

- 1.04ha for Tarletons Road (4 lane arterial)
- 1.00ha for local park (LP-07)
- 5.17ha for conservation reserve
- 2.30ha for drainage reserve

The balance of the site, just 2.75ha, is developable for residential purposes. Part of this area is nominated as an 'amenity area' suitable for higher densities.

The proposed Clause 37.07 schedule 13 will apply the Residential Growth Zone 1 (RGZ1) where it is area for increased density, the General Residential Zone 1 (GRZ) for the remaining land and Transport Zone 2 (TRZ2) for the proposed 4-lane arterial road of Tarletons Road. The objectives of the RGZ1 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. The TRZ aims to use and develop land to aid an efficient transport system.

The site is located nearby a Neighbourhood Activity Centre, Active Open Space, and government primary school to the southwest. A small area of the site is identified as an area of increased density. 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.

Table 3 and Table 4 set out targets for density and affordable housing. Table 3 requires an average density of 30 dwellings per ha or more is targeted for parts of this site abutting Tarletons Road and the conservation area and open space, and up to 3 different housing typologies should be provided. The mix of dwelling typologies that the PSP states this site should include: 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 and amenity areas and Kororoit Creek.

For areas of the site not abutting open space or Tarletons Road, the target density is 20 dwellings per NDHa. Two housing typologies are required, including attached townhouse development, semi-detached/duplex style development, detached traditional style housing, multi-unit low-rise social and affordable housing, as well as retirement living and Small Lot Housing Code products (in limited cases).

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 at Figure 10. This road is not ICP funded and will be delivered by the developer at their cost. Streetscapes must achieve a minimum 30% canopy tree coverage.

The Conservation Areas makes up a large portion of this site:

- Development within the Biodiversity Conservation Strategy conservation area must be in accordance with the Conservation Area Concept Plan, unless otherwise agreed to by the DEECA and the responsible authority.
- Waterway crossings within the BCS conservation area must be designed and constructed in accordance with Growing Grass Frog Crossing Design Standards to the satisfaction of the DEECA, Melbourne Water and the Responsible Authority.
- Public paths or other infrastructure located within a BCS conservation area must be designed to avoid and minimize disturbance to native vegetation and habitat for matters of national and state environmental significance and be in accordance with the BCS Conservation Area Concept Plans.
- Where local parks and recreation areas are located adjacent to BCS conservation areas they must be designed and managed to complement the BCS.

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 10: Local Road (20m) Cross Section (Source: Victoria Planning Authority– March 2025)

Local Access Street Level 2 (20m)

VPA Standard Cross Section

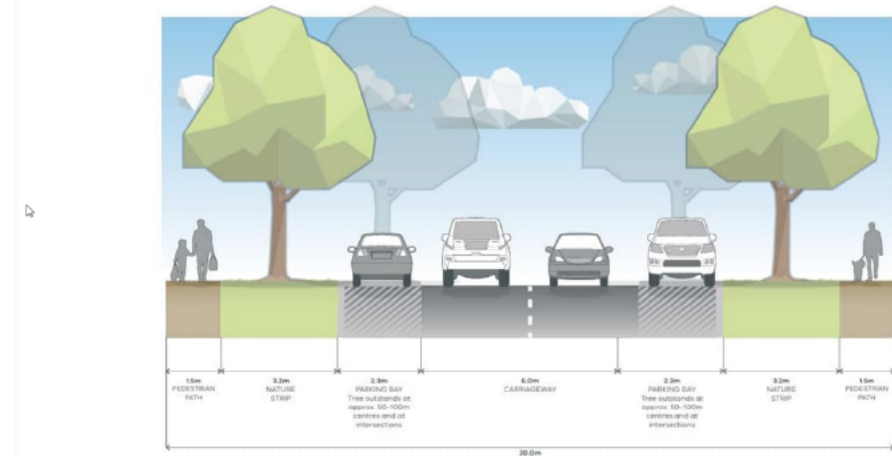
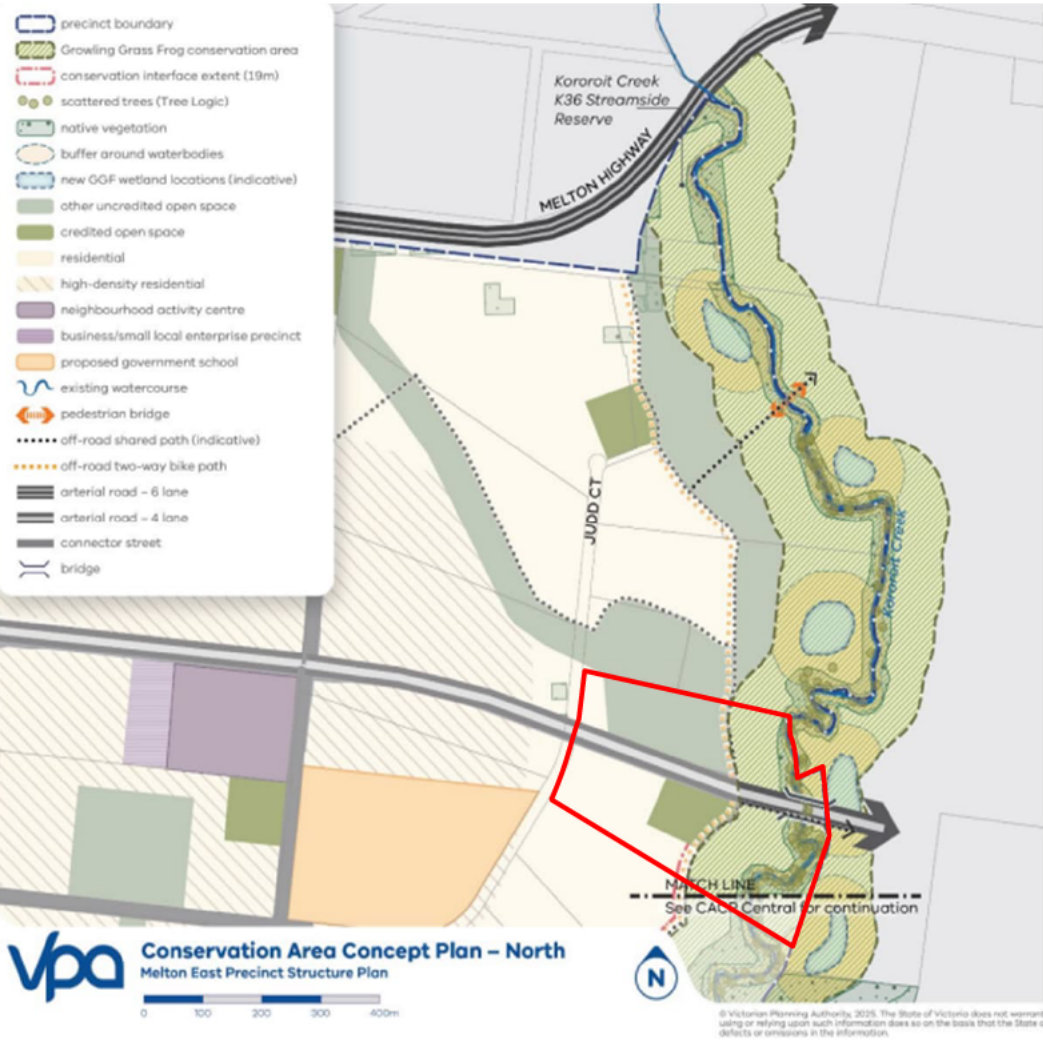


Figure 11: Melton East Precinct Infrastructure Plan (Source: Victoria Planning Authority– March 2025)



Figure 12: Conservation Area Concept Plan- North (source: Melton-east PSP 2025)



Infrastructure Staging

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

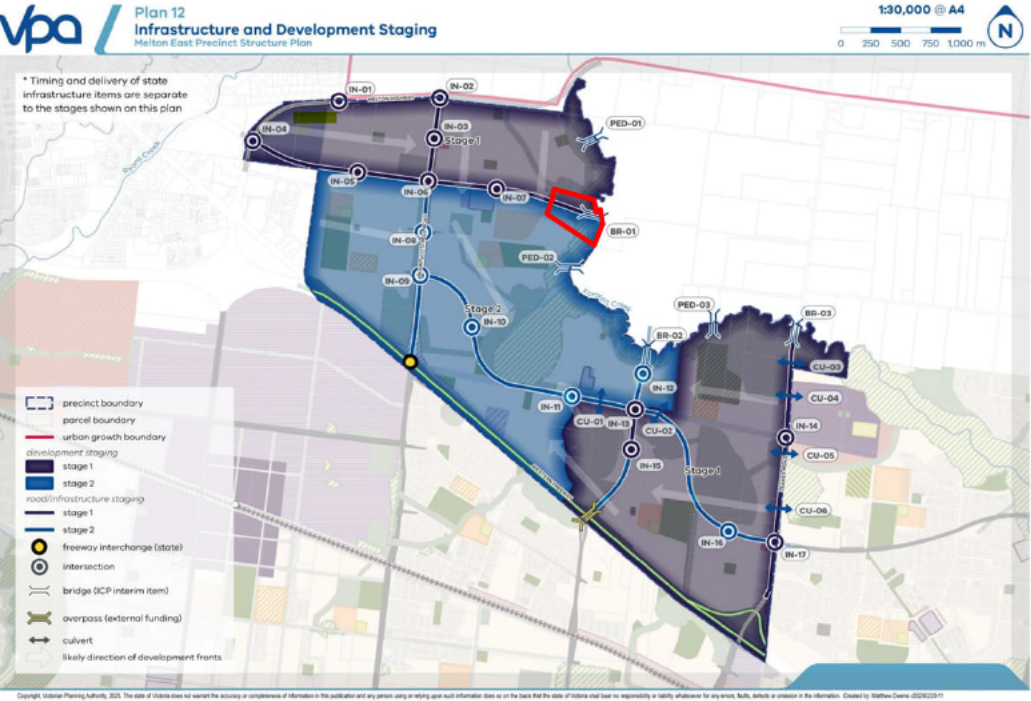
The Precinct Infrastructure Plan, Plan 12, identifies projects as being delivered in the short term 0-5 years, medium term 5-15 years and long term 15+ years. This means that short term projects are Stage 1 projects, medium term projects are Stage 2 projects and long-term projects are those that can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

The development of the site is nominated as partly in Stage 1 (0-5 years) and partly 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 13: Infrastructure and Development Staging(source: Melton-east PSP 2025)



Submission to Draft PSP

While our client supports the intent of the PSP, we propose refinements to improve the equitable distribution of land use burdens and enhance the development potential of the site. In other completed PSPs with a similarly arrangement of fragmented ownership we have seen development not progress despite the PSP having been approved many years ago. Several PSPs across Melbourne's growth areas have experienced significant delays despite being approved, primarily due to fragmented land ownership, financial viability concerns, and infrastructure delivery challenges. We understand that the VPA is currently reviewing such PSPs to facilitate solutions that unlock development.

Financial viability is a critical concern for our client's proposed development. The subject site is heavily constrained with drainage reserve, arterial Road, local park and conservation area designated for their land, leaving little net developable area and little incentive to progress. We have noted that the current draft PSP designates 9.87 hectares of encumbrances within the 12.26-hectare site.

The high costs associated with necessary infrastructure improvements such as drainage systems, arterial road, and utilities pose significant barriers to investment. Without clear incentives or support from the state government to alleviate these financial burdens, the viability of developing the site remains uncertain, discouraging potential developers from engaging with the project.

Furthermore, the complexities of fragmented land ownership in the area hinder collaborative efforts to address these challenges. Coordination among multiple stakeholders is essential for successful development, yet differing priorities and interests among landowners can lead to delays and conflicts. This lack of collaboration stifles progress and makes it difficult to implement cohesive infrastructure solutions that benefit the entire precinct.

Whilst we appreciate that it is challenging to allocate public land within a precinct the contains fragmented ownership across smaller parcels, we submit that our client has been particularly unfairly burdened by the draft PSP. A more equitable distribution of encumbrances is requested. The encumbrances on the site total 9.87 hectares out of a total site area of 12.26 hectares.

Delivery of key infrastructure

Delivering key infrastructure in precinct structure plans can be particularly challenging when dealing with small parcels of land in fragmented ownership. Fragmented ownership makes it difficult to coordinate efforts and each owner may have different priorities, timelines, and willingness to progress development and therefore to invest in infrastructure, leading to delays and inefficiencies.

The site is nominated within Stage 2 of the PSP and cannot be developed until the delivery of Stage 1 infrastructure. Part of the site contains land required to deliver a Stage 1 arterial road and drainage asset. The timing of this staging therefore raises significant concerns about the timely delivery of the balance of the site including the local park and affordable housing.

We submit that it will be important to apply a PAO over the necessary road reserve of Tarletons Road and the drainage assets. We further submit that the entire site be included in Stage 1 to support the delivery of this key infrastructure.

Relocation of the Local Park (LP-07)

It is submitted that the local park must be relocated to another property to balance the current inequity in community and physical assets when compared to the surrounding properties. The proposed local park is entirely contained within our client's site, placing an undue burden on a single landowner, particularly given the extensive site constraints already accommodated within the site. An alternative location more central to the residential catchment and away from the arterial road would achieve better alignment with existing constraints and broader recreational outcomes.

We request that the park be relocated to a position that allows for a fairer distribution of open space requirements across landowners, ensuring equitable outcomes and a well-connected open space network in accordance with PSP principles.

Potential Refinements to the Conservation Area

Our client is concerned about the arrangement of and extent of land set aside for conservation values and will be seeking further ecological advice in this regard. Our client has instructed us to investigate the potential for an application to be made to DEECA for a more efficient and ecologically beneficial arrangement of conservation area 15. We will keep the VPA updated in this regard.

Our submission is that our client does not accept the Conservation Area in its current form as proposed in the PSP and requests that it be reviewed.

Potential Refinements to the Drainage Reserve

We acknowledge that drainage planning for this PSP appears complex and expensive, given the extensive waterways and retarding basins.

We request further review of the Drainage Services Scheme (DSS) to assess whether refinements can be made to the 2.30ha drainage reserve on our client's site, potentially reducing its footprint or integrating it with adjacent reserves for greater efficiency.

Precedent exists in other PSPs where targeted refinements to DSS allocations have improved developable land outcomes without compromising flood protection or water quality objectives.

We question the extent of the land take required for the drainage reserve. Our client has instructed us to further investigate the drainage reserve extent, and we reserve the right to make further submissions in this regard. It is important that the PSP contain flexible requirements and guidelines regarding the refinement of the landtake for drainage assets. Our submission is that our client does not support the current drainage proposals.

Density, 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 30 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 and Kororoit Creek, are appropriate for the site. However, accommodating this within the available NDA may be difficult. Given the site's proximity to a Neighbourhood Activity Centre (NAC), active open space, and a government primary school, **we propose that the Amenity Area be expanded across the whole of the site, rather than limiting it to the limited edges of the currently nominated 'amenity area.'** Increased density in this location would improve housing diversity, affordability, and viability while efficiently utilising infrastructure investments.

The PSP already encourages a mix of housing typologies, including townhouses, low-rise apartments, and integrated developments for areas abutting Tarletons Road, local open space and the Conservation Reserve. Expanding the high-density land designation to the balance of the site would better align with the PSP's strategic intent and broader policy directives such as Plan Melbourne's 20-minute neighbourhood framework, and facilitate a more efficient development opportunity for the site.

In addition, 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.

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.

Other Considerations

The proposed Judd Court Local Access Street (20m width) is not funded under the Infrastructure Contributions Plan (ICP) and will need to be delivered by the developer. The financial feasibility of this requirement should be further assessed given the fragmented land ownership in this location.

The requirement for 30% streetscape canopy tree coverage is noted and supported, provided appropriate flexibility is allowed in implementation.

Any waterway crossings within the Biodiversity Conservation Strategy (BCS) conservation area must comply with Growing Grass Frog Crossing Design Standards. We seek confirmation that the current Concept Plan allows for necessary road and path crossings while maintaining ecological objectives.

Summary and Conclusion

In conclusion, while our client acknowledges the overarching goals and intent of the Draft Melton East PSP, several refinements are necessary to ensure a more balanced, financially viable, and equitable development. The current design disproportionately burdens our client's site, particularly with respect to the allocation of land for encumbrances such as drainage reserves, arterial roads, local parks, and conservation areas. These challenges are exacerbated by fragmented land ownership, which hinders effective coordination and timely infrastructure delivery.

Our client seeks a more equitable distribution of these encumbrances and requests further investigation into the reduction and refinement of land take for drainage reserves. The relocation of the local park and the inclusion of our client's site in Stage 1 of the infrastructure delivery plan are critical to facilitating the timely development of the site. Additionally, our client supports a more flexible approach to the affordable housing and density requirements to ensure the site's development potential is maximised while aligning with broader strategic objectives.

In summary, our client requests the following:

1. Equitable Distribution of Encumbrances

Request a review of the distribution of encumbrances, particularly with respect to the local park, conservation area, and drainage reserve, to ensure a fairer allocation of land burdens across all landowners within the PSP area.

2. Infrastructure Delivery and Staging

Propose the inclusion of the entire site in Stage 1 to support the delivery of key infrastructure such as the arterial road and drainage assets.

Additionally, request the application of a PAO over the necessary road reserve and drainage assets to facilitate this.

3. Relocation of the Local Park

Request for the relocation of Local Park (LP-07) to a more central location within the residential catchment, away from the arterial road, to better align with site constraints and achieve broader recreational outcomes.

4. Review of Conservation Area

Seek a review of the conservation area designation based on topography and ecological features, and potential for an application to DEECA for a more efficient arrangement of conservation land that balances ecological benefits with development potential.

5. Drainage Reserve Refinement

Request further review of the Drainage Services Scheme (DSS) to assess opportunities for reducing the footprint of the drainage reserve or integrating it with adjacent reserves to optimise developable land.

Request flexible requirements to enable adjustment of land take for drainage assets.

6. Density and Housing Typology

Request clarification on the term "integrated" developments.

Propose an expansion of the Amenity Area across the whole site to support higher-density housing typologies, particularly townhouses and low-rise apartments, to better suit the area's demographic needs and align with broader strategic policies such as Plan Melbourne's 20-minute neighbourhood framework.

7. Affordable Housing Mix

Recommend revisiting the affordable housing target mix to allow for a more balanced distribution of housing types, focusing on a higher proportion of 2- and 3-bedroom dwellings in line with local demand, particularly for families near the proposed school.

8. Financial Viability of Local Access Street

Request a financial viability assessment of the requirement for the developers to fund the Judd Court Local Access Street, given the fragmented land ownership in this location.

9. Flexibility in Streetscape and Ecological Considerations

Request flexibility in implementing the streetscape canopy tree coverage requirement and seek confirmation that waterway crossings within the BCS conservation area align with Growling Grass Frog Crossing Design Standards.