

31 March 2025

Ms Genna Walkley  
Strategic Planning Manager - Metropolitan Melbourne West  
Victorian Planning Authority  
Via email: [MeltonEast@vpa.vic.gov.au](mailto:MeltonEast@vpa.vic.gov.au)

Dear Ms Walkley,

## Submission – Proposed Planning Scheme Amendment C244melt

SPOT Planning continues to act on behalf of Yale Asset Development 2 with respect to their interest in the following parcels within the future Melton East Precinct Structure Plan (PSP) area:

- 2-32 Paynes Road, Grangefields; and
- 34-64 Paynes Road, Grangefields

These two properties are approximately 11.97ha and 12ha in area respectively and are generally rectangular in shape. The subject site is located south-west of the Beatty's Road and the Paynes Road intersection.

The properties are located at the southern extent of the draft Melton East Structure Plan and are identified specifically as property 67 and 68 in the Land Use Budget Plan. The Land Use Budget outlines the combined net developable area of these properties as 16.97ha, which represent 70.79% of the property and the balance 29.21% as encumbered for other purposes.



*Subject Site*

On behalf of Yale Asset Development 2, we would like to firstly commend the Victorian Planning Authority on the advancement of the Melton East Precinct Structure Plan and Amendment C244melt to formal public exhibition. This is a significant milestone for the project and we acknowledge the work and effort required to coordinate and Structure Plan of this scale and complexity.

We also appreciate the proactiveness during the exhibition period to arrange Drainage Strategy workshops with Melbourne Water in an effort to resolve critical issues prior to the close of the exhibition period.

Whilst we welcome and support the intent behind the proposed Planning Scheme Amendment C244melt, we would like to take this opportunity to raise the following key issues as objections for further discussion/consideration as part of the refinement to the final Planning Scheme Amendment documentation and draft Melton East Precinct Structure Plan and draft Infrastructure Contributions Plan.

These are summarised below and expanded upon within this submission:

- **Protection of Seasonal Herbaceous Wetlands.**
- **Aboriginal Cultural Heritage Values.**
- **Melbourne Water Drainage Strategy.**
- **Precinct Infrastructure Burden and the Infrastructure Contributions Plan.**
- **Staging Plan and Implementation.**
- **Density Expectations.**
- **Social and Affordable Housing.**
- **Specific PSP Plans, Objectives, Requirements, Guidelines and Appendices.**

#### Protection of Seasonal Herbaceous Wetlands

We note the significant drainage encumbrances within the draft Melton East Precinct Structure Plan and understand that part of the Drainage Strategy design scope includes the protection of environmental values, including suggested Seasonal Herbaceous Wetlands.

The Flora and Fauna Survey and Condition Assessment of the Paynes Road Wetland prepared by Rakali Ecological Consulting utilises a scientific determination criteria to determine the environmental values of the Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains at the Paynes Road wetland. The criteria assessment confirmed that the ecological community is present at the site, however the report also determined that:

- the Seasonal Herbaceous Wetland is not identified on the Department of Energy, Environment and Climate Action NatureKit tool;
- the Seasonal Herbaceous Wetland was not recognised by a highly experienced Department of Sustainability and Environment botanist from a site inspection during a dry phase; and
- the Seasonal Herbaceous Wetland predictive modelling only estimates a low likelihood of the site being a Seasonal Herbaceous Wetland.

The report makes no reference to the land being located within a Melbourne Strategic Assessment (MSA) area and the impact of the Melbourne Strategic Assessment Program. The entirety of the Melton East Precinct Structure Plan area is in fact located within an MSA area and the protection of environmental values outside of the State Biodiversity Conservation Areas is contrary to the purpose of the MSA Program.

The MSA Program was first implemented in 2010 and identified 'time-stamped' mapping of native vegetation, threatened species habitat and scattered trees within the States Growth areas. The intention of the MSA Program is not only to protect values of national environmental significance and state significance, but to streamline the development approvals via an Environmental Mitigation Levy to offset any impacts on biodiversity as part of urban development within the growth corridors. The Biodiversity Conservation Areas are considered a strategic offset to facilitate urban development.

The MSA Program is underpinned by the *Melbourne Strategic Assessment (Environment Mitigation Levy) Act 2020* and the Biodiversity Conservation Strategy (BCS) for Melbourne's Growth Corridors (2013) prepared by the Department of Environment and Primary Industries.

The BCS was prepared in response to obligations arising from the Strategic Assessment conducted under Part 10 of the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*. Of particular importance to this submission is **Section 1.1 – Purpose of the Biodiversity Conservation Strategy** and **Section 1.2 – Scope of the Biodiversity Conservation Strategy**. We highlight the following paragraphs on page 2-3 and provided as **Appendix A**, to emphasise the foundations of the Biodiversity Conservation Strategy for Melbourne's Growth Corridors (2013):

*The BCS has applied the requirements of the prescriptions and the Native Vegetation Management Framework (DNRE, 2002) strategically at a growth corridor level to identify conservation areas, and removes the need to protect additional land resulting from these requirements at the precinct structure planning stage, or other development approval stages.*



by the Commonwealth Environment Minister under the endorsed program and subject to Victorian legal and planning processes (e.g. *Flora and Fauna Guarantee Act 1988*, *Planning and Environment Act 1987*).

The BCS has applied the requirements of the prescriptions and the Native Vegetation Management Framework (DNRE, 2002) strategically at a growth corridor level to identify conservation areas, and removes the need to protect additional land resulting from these requirements at the precinct structure planning stage, or other development approval stages.

In accordance with the program report, survey, salvage and/or translocation and offset requirements apply to land that is suitable for urban development and may be cleared of native vegetation. These requirements are set out in the BCS.

The biodiversity values of some land previously set aside for conservation under Planning Scheme Amendment VC 68 have been re-assessed. Some of this land was found to be of lower biodiversity value and is not required for conservation. These areas of land have been excluded from the conservation areas and may be made available for urban development.

In accordance with the program report, the BCS addresses all matters of national environmental significance that are currently known to occur in the growth corridors and matters of state significance. The matters of national environmental significance are:

- > Commonwealth listed threatened species and ecological communities
- > Commonwealth listed migratory species
- > Wetlands of international importance.

The matters of state significance are:

- > Threatened species and ecological communities listed under the *Flora and Fauna Guarantee Act 1988*
- > Species listed on the DEPI's Rare and Threatened Species Advisory Lists.

The BCS does not require future protection of any additional land to that identified in the BCS, for matters of national environmental significance or state significance that are not currently known to occur within the growth corridors, or for new matters listed under the *Environment Protection and Biodiversity Conservation Act 1999* or the *Flora and Fauna Guarantee Act 1988*.



Photo: Large-fruit Groundsel, DEPI

The precinct structure planning stage or planning permit stage may provide opportunities to protect these matters on a voluntary basis, particularly on land unavailable for urban development (e.g. on land set aside for open space or drainage or road reserves).

Two sub-regional species strategies for Growling Grass Frog and Golden Sun Moth have been prepared to support the BCS. The requirements of these strategies are consistent with the requirements of the BCS. In the event of an inconsistency, the BCS prevails over the Growling Grass Frog and Golden Sun Moth strategies.

A third Sub-regional Species Strategy for Southern Brown Bandicoot is currently being prepared by DEPI. The strategy will focus on areas outside the area covered by the BCS. The BCS may require amendment for the south-eastern growth corridor to be consistent with any additional requirements of the strategy. The strategy requires approval from the Commonwealth Government.

The BCS does not assess the impacts of the State Government's program on matters of national environmental significance or state significance, but rather outlines how the commitments in the program report will be achieved. The assessment of the impacts of the program was undertaken by the Melbourne Strategic Assessment (see section 2.1).

In accordance with the program report, *survey, salvage and/or translocation and offset requirements apply to land that is suitable for urban development and may be cleared of native vegetation*. These requirements are set out in the BCS.

The BCS does not require future protection of any additional land to that identified in the BCS, for matters of national environmental significance or state significance that are not currently known to occur within the growth corridors, or for new matters listed under the *Environment Protection and Biodiversity Conservation Act 1999* or the *Flora and Fauna Guarantee Act 1988*.

The precinct structure planning stage or planning permit stage may provide opportunities to protect these matters on a voluntary basis, particularly on land unavailable for urban development (e.g. on land set aside for open space or drainage or road reserves).

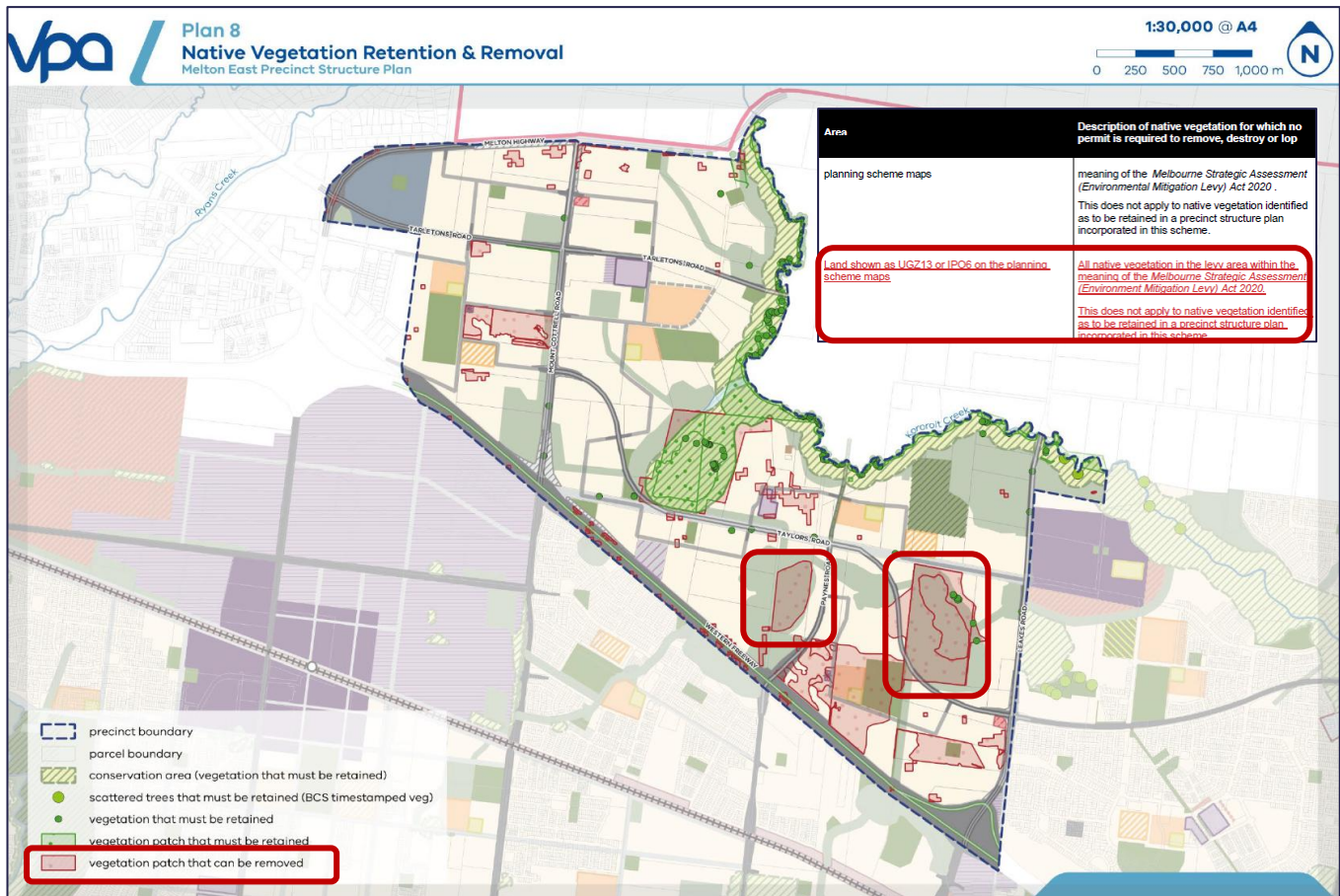
BCS – Page 3

We note the purpose and intent of the MSA Program and the Biodiversity Conservation Strategy, providing for the protection of matters values of national environmental significance and state significance and allowing the removal of native vegetation/habitat outside the State designated Conservation Areas to facilitate urban Development.

We further note the planning provisions of the exhibited Planning Scheme Amendment and the draft Melton East Precinct Structure Plan have been prepared on the basis of allowing for the removal of these environmental values, without the need to obtain a planning permit – as intended by the MSA Program.

The exhibited draft Clause 52.17 Schedule, along with Plan 8 – Native Vegetation Retention and Removal Plan – clearly demonstrate that the Seasonal Herbaceous Wetlands/environmental values within the designated wetlands (outside of the BCS Areas) have been nominated for removal without requiring planning permission.

This outcome is completely contrary to the Drainage Scheme Design that seeks to protect these environmental values



#### Clause 52.17 Schedule and Plan 8 – Native Vegetation Retention and Removal

At this time, we are seeking our own Legal Advice on the Frameworks for Environmental Protection within the Melton East Precinct Structure Plan, and our own independent Ecological Advice on the likelihood of Seasonal Herbaceous Wetland values being present within the precinct and adjoining the subject site.

***In summary, this submission seeks to remove the protection of the Seasonal Herbaceous Wetland environmental values entirely from the Melton East Precinct Structure Plan and Drainage Strategy, consistent with the outcomes of the Melbourne Strategic Assessment Program and Biodiversity Conservation Strategy and allowing for a more efficient Drainage Strategy.***

#### Aboriginal Cultural Heritage Values.

We further note the significant drainage encumbrances within the draft Melton East Precinct Structure Plan and understand that part of the Drainage Strategy design scope includes the protection of wetlands in accordance with the recommendations of the Aboriginal Cultural Values Assessment prepared by Unearthed Heritage and the application of a predicted archaeological sensitivity buffer.

Whilst we acknowledge the Indigenous and Cultural Heritage Values are an important aspect of growth area planning and land development and are generally supportive of the other outcomes recommended within the Aboriginal Cultural Values Assessment, we do not support the protection of the wetlands and environmental values as recommendation due to the impact this has to the Melton East precinct and the application of the MSA Program.

Noting the significant encumbrances within the Melton East precinct, and lack of developable area (less than 50% within the precinct), a more balanced approach to the various stakeholder objectives/expectations is required.

We further note the outcomes of the Officer South Standing Advisory Committee Referral 8 Report as it relates to Aboriginal Cultural Heritage, which considers the *Aboriginal Heritage Act 2006* and the associated Regulations as the proper and most suitable tool for identifying, protecting and managing cultural heritage values.

In addition, contrary to the Officer South Precinct Structure Plan, the Melton East Precinct Structure Plan does not nominate areas as 'Cultural Value Investigation Areas' – rather a 'Predicated Archaeological Sensitivity' Plan.



Whilst we can appreciate that the area around the wetlands and creek corridors may provide for a higher archaeological sensitivity than areas beyond, these areas remain within a designated area of Aboriginal Cultural Heritage Sensitivity as applied under the *Aboriginal Heritage Act 2006* and the associated Regulations. Thus, a mandatory Cultural Heritage Management Plan is required at the development stage.

The protection of these wetlands as part of the strategic planning phase, along with the application of a predicated archaeological sensitivity buffer, limits the ability to provide for the most efficient Drainage Strategy outcomes, that would otherwise utilise these locations for drainage infrastructure.

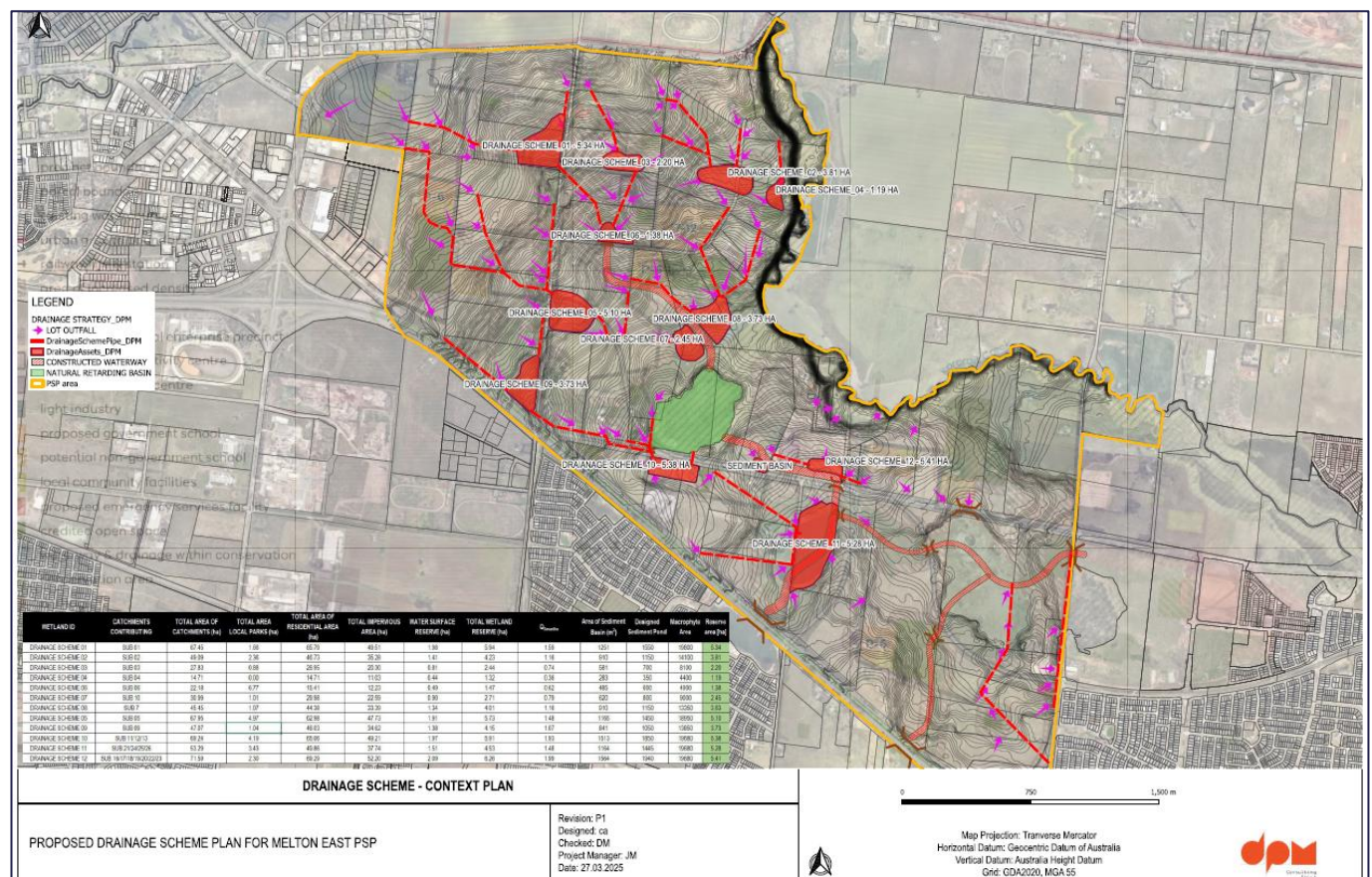
*In summary, this submission seeks to allow the Cultural Heritage values to be addressed in accordance with the Aboriginal Heritage Act 2006 and the associated Regulations which would require a mandatory Cultural Heritage Management Plan prior to future planning approvals and urban development.*

### Melbourne Water Drainage Strategy

It is understood that the current Melbourne Water Drainage Strategy is founded on the protection/preservation of environmental values including Seasonal Herbaceous Wetlands within the precinct. Furthermore, we note our submission above and the application of the predicted archaeological sensitivity buffer around the environmental values and nominated 'Pre-European wetlands.' As a result, the Drainage Scheme to service the precinct is not as efficient as what could be designed if these environmental values were excluded from the design response.

DPM Consulting have undertaken a Preliminary Drainage Investigation and have prepared an Indicative Drainage Scheme Design (limit of DSS investigations to subject site without investigating downstream) to provide a more efficient outcome, without the protection of these environmental values or applied predicted archaeological sensitivity buffers. The Indicative Drainage Scheme Design adopts a more distributed approach in comparison to the existing Scheme Design, with more drainage assets within the precinct but at a much smaller scale. The alternative Drainage Scheme design would not only reduce the cost to the Drainage Scheme charges but would increase the developable area of the precinct by conservatively 10ha.

The Indicative Drainage Scheme Design as prepared by DPM Consulting has been overlaid on the PSP to demonstrate the alternative outcome. The Indicative Drainage Scheme Design is provided as **Appendix B** for reference.



Indicative Drainage Scheme Design

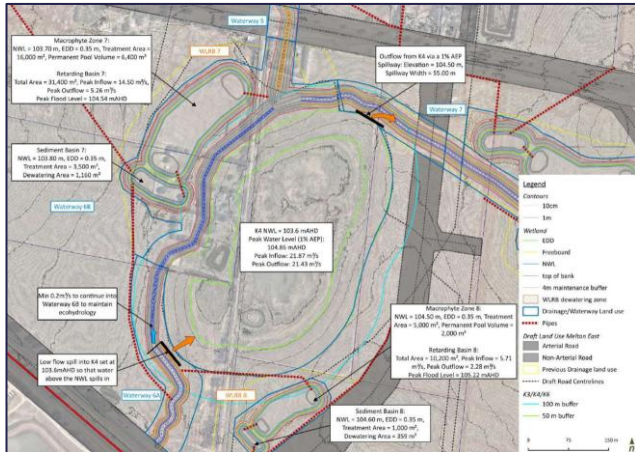
*In summary, it is recommended to refine the Drainage Scheme Design to exclude the protection of Seasonal Herbaceous Wetlands and the predicted archaeological sensitivity buffer in order to provide for the most efficient drainage design for the precinct.*



In the circumstance that this is not accepted by the Victorian Planning Authority, Melbourne Water and/or the Planning Panel, we note the current drainage infrastructure design, in particular around Kororoit Wetland K4 - creates pockets of 'developable area' that would result in an undesirable planning/development outcome adjoining the Paynes Road and Taylors Road arterial roads and the drainage infrastructure.

Access to these pockets of 'developable area' would be limited due to the arterial road status of Paynes Road and Taylors Road, and the Melton East PSP cross sections generally requiring a local road interface to both the arterial road and the drainage infrastructure. This places a significant infrastructure burden on an already compromised 'developable area.'

The proposed drainage infrastructure surrounding the Kororoit Wetland K4 could be re-located/re-designed to provide for a near neutral 'developable area' outcome, but maximise the functional and useable 'developable area' that would provide a more positive development response as part of future urban development



K4 – Functional Design

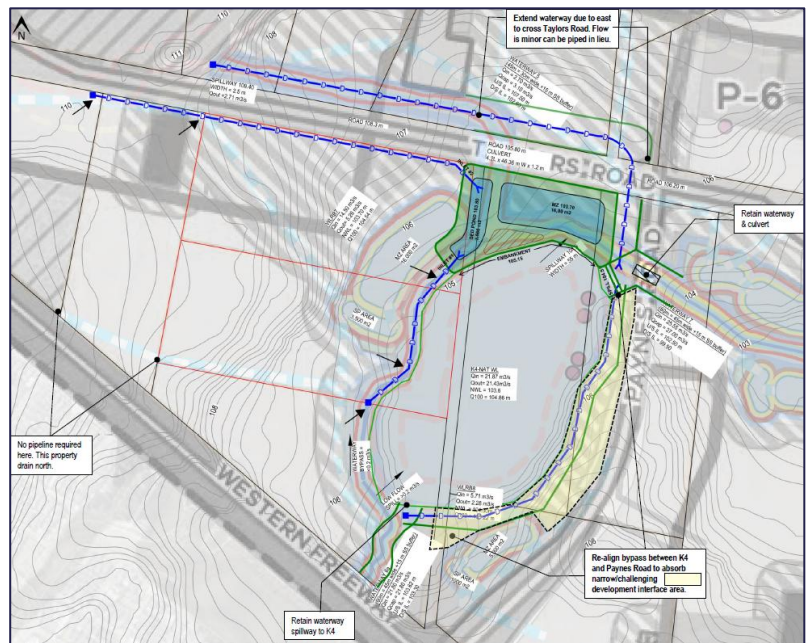


Melton East Place Based Plan – undesirable 'developable area'

As such, should the Panel recommend the protection/preservation of these wetlands within the precinct – despite the MSA Program intentions and the separate requirements of the *Aboriginal Heritage Act 2006* and the associated Regulations, it is recommended to re-design the drainage infrastructure surrounding by Kororoit Wetland K4 to maximise the functionality of developable area as follows:

- Re-align the bypass to the east of K4 to absorb the undesirable 'developable area' wedged between the drainage infrastructure and Paynes Road.
- Re-locate the Sediment Pond and Macrophyte Zone to the north of K4 to absorb the undesirable 'developable area' wedged between drainage infrastructure and Taylors Road.
- Extend the waterway north of Taylors Road, further to the east to cross Taylors Road at the appropriate locations as a result of the modified drainage design or pipe these flows to mitigate impact.

DPM have provided an alternative K4 Concept Design to demonstrate this outcome, which was further discussed at the Melbourne Water workshop scheduled on 18 March 2025. The alternative K4 Concept Design and Memorandum is provided as **Appendix C** for reference.



K4 – DPM Concept Design

*In summary, should the Panel determine that the Seasonal Herbaceous Wetlands should be protected/retained, along with the predicted archaeological sensitivity buffer as part of the Melton East Precinct Structure Plan, the drainage infrastructure surrounding Kororoit Wetland K4 is recommended to be updated as per the Concept Design prepared by DPM in order to reduce the undesirable 'developable area' between the drainage assets and the adjoining Arterial Roads and maximise the functional and usable developable area.*

### Precinct Infrastructure Burden and the Infrastructure Contributions Plan

We note the Melton East Precinct Structure Plan is significantly encumbered, and whilst there is a gross area of 1,005ha, only 502ha is considered 'developable area.' This represents less than 50% of the precinct being considered as 'developable' which is a fundamental flaw in the draft Melton East PSP. This places a significant infrastructure cost on the precinct and land that is considered developable.

The draft Melton East Infrastructure Contributions Plan identifies a supplementary levy for the precinct of \$342,933.55 dollars per net developable hectare, which is considerably higher than the standard levy alone for residential development. The total supplementary levy across the precinct is **\$172,110,706.25** dollars due to the burden of Transport Infrastructure including Arterial Roads, Connector Roads intersection with Arterial Roads and Bridge Crossings.

This is coupled with less than 50% of the precinct being considered 'developable area,' resulting in less land for the contributions to be amortised across.

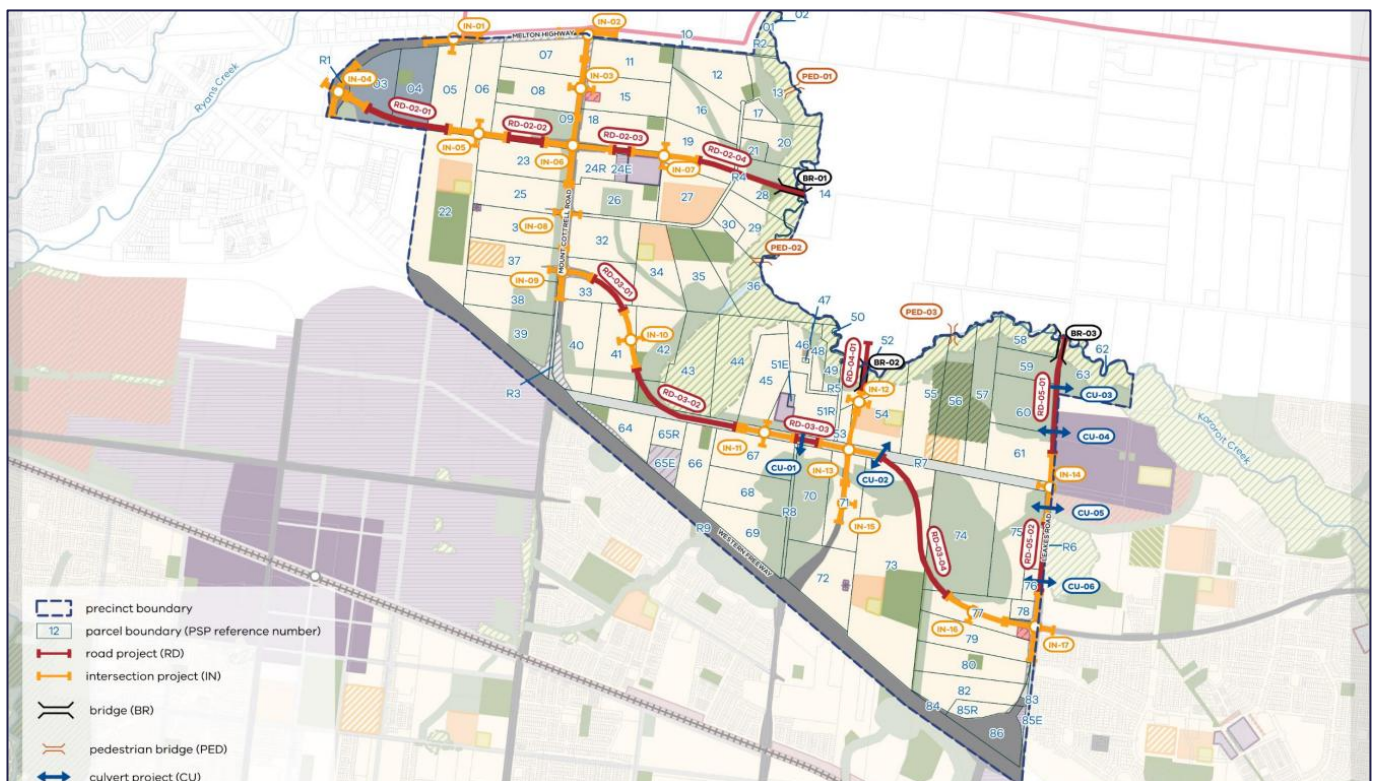
Whilst we can appreciate the challenges of designing a suitable road network within a precinct with constraints such as the Kororoit Creek corridor and the Biodiversity Conservation Areas, we would suggest that there could be refinements to reduce the overall Transport Infrastructure burden within the precinct, without hindering the overall road network design. In our view, the current design is inefficient and could further utilise existing road reservations and alignments rather than creating new alignments and acquiring additional land for this infrastructure.

Given the burden of Transport Infrastructure is significant, we would recommend a formal review of the necessity of some of the Arterial/Connector intersection and the Bridge Crossings within the precinct in order to determine what is needed for the road network to function effectively, and what has been provided purely for connectivity/permeability purposes. Noting the Transport Infrastructure burden on the precinct, a balanced view of the needs and wants for Transport Infrastructure within the Melton East precinct is required.

Based on a purely planning review of the road network and Transport Infrastructure within the precinct, we would question the extent of Connector Roads and Arterial/Connector intersection and suggest a greater reliance on Local Access roads and Local Access Level 2 roads could be utilised to balance the road network design. The Arterial/Connector intersection increase the burden of infrastructure with the Infrastructure Contributions Plan.

Furthermore, we would question the need for Paynes Road to continue across the Kororoit Creek and into the future Warresbrook precinct, given there are already two separate bridge crossings at Leakes Road and Tarletons Road. We note there was a Bridge Crossings Review undertaken by the Victorian Planning Authority in consultation with the Department of Transport and the City of Melton. We would appreciate the outcomes of the Bridge Review to be further conveyed to landowners within the precinct, to determine whether the need for three separate Bridge crossings are justified from a traffic capacity perspective.

We are currently undertaking our own Traffic Investigations at this time to provide a more informed position and reserve the right to make further submissions on this basis during the Consultation and Panel process.



Transport Infrastructure - ICP



The Transport infrastructure we would like to specifically highlight and question their necessity within the road network design include:

- ME-IN-01 - Question the need for IN-01 and the internal Connector Road status given there are two alternative outlets to Melton Highway via Mount Cottrell Road and Tarletons Road in this pocket and suggest the removal of this project entirely from the Melton East PSP and the Infrastructure Contributions Plan.
- ME-IN-08 – Question the validity of a Connector Road – Connector intersection for inclusion within the Infrastructure Contributions Plan in accordance with the Ministerial Direction on the Preparation and Content of Infrastructure Contributions Plans and suggest the removal of this project entirely from the Melton East PSP and the Infrastructure Contributions Plan.
- ME-IN-12 – Question the need for the east-west connection Suggest this road link be provided as a Local Access – Level 2 and the northern continuation be removed entirely, resulting in the intersection removed from the ICP.
- ME-RD-04-01 and ME-BR-02 – We question the need for Paynes Road to continue north and the Bridge Crossing into the future Warrensbrook precinct noting the additionally proposed Leakes Road and Tarletons Road bridge crossing. We suggest both projects could be removed from Melton East PSP and the Infrastructure Contributions Plan.
- ME-PED-02 – We question the need for three pedestrian bridge crossings of the Kororoit Creek and suggest the removal of this project entirely from the Melton East PSP and the Infrastructure Contributions Plan.

The removal of the abovementioned projects alone would represent a cost saving of approximate **\$43,630,960.35** to the Transport Infrastructure within the draft infrastructure Contribution Plan and reduce the overall residential monetary component of the Infrastructure Contributions Plan from **\$599,583.55 per net developable hectare** to approximately **\$511,970.23ha per net developable hectare**.

Furthermore, we would like to encourage additional efficiencies to the Drainage Strategy design in order to maximise developable area across the precinct and spread the infrastructure burden across a greater extent of land. It is noted the indicative Drainage Scheme Design prepared by DPM Consulting increases the developable area of the precinct by conservatively 10ha.

We note the Public Land Equalisation requirements in addition to the Standard Monetary component. Whilst there is no concern or objection with the Public Land Equalisation requirement, this will be an additional significant contribution required of development within the precinct, beyond the Monetary Component currently outlined within the draft Infrastructure Contributions Plan.

In order to demonstrate the impact of all the contributions associated with the project, we have summarised the approximate Infrastructure Contributions Plan obligations, Growth Area Infrastructure Charge obligations and the Environmental Mitigation Levy Obligations for the property below. It is noted this summary excluded the potential Social and Affordable Housing Contributions at this time.

The summary demonstrates an overall Infrastructure Contributions Plan, Growth Area Infrastructure Charge and the Environmental Mitigation Levy Obligation of **\$20,993,283.46** across the 16.97ha of developable land within the subject site.

Infrastructure Contributions Summary											SPOT PLANNING		
Planning Permit No: NA													
2 - 32 Paynes Road and 34-64 Paynes Road Grangefields													
Stage	PSP	Estate Name	Permit No.	Property ID	Gross Area	NDA	Monetary Component	Public Land Component	Total ICP Cash Flow	Total MSA Levy Cash Flow	Total GAIC Obligation	Potential Social and Affordable Housing Contribution	Total Contributions
Total	Draft Melton East PSP	N/A	N/A	67	11.97	9.1700	\$5,498,181.15	\$3,500,853.68	\$8,999,034.83	\$375,401.18	\$1,642,643.10	TBD	\$11,017,079.11
Total	Draft Melton East PSP	N/A	N/A	68	12	7.8000	\$4,676,751.69	\$3,394,965.60	\$8,071,717.29	\$257,727.06	\$1,646,760.00	TBD	\$9,976,204.35
					23.9700	16.9700	\$5,498,181.15	\$6,895,819.28	\$17,070,752.12	\$633,128.24	\$3,289,403.10	TBD	\$20,993,283.46

**NOTES**  
 ICP values are approximately indexed to 2024/25 dollars and are subject to indexation from 1 July each year.  
 Based on draft ICP on public exhibition.  
 Plumpton/Kororoit Land Valuation adopted.  
 IN-11 WIK credit not calculated in this summary.

#### Contributions Summary

Whilst we appreciate the need for urban development to levy funds for the delivery of higher order infrastructure, we are concerned that the contributions, particularly the Supplementary Transport Levy currently required by the draft Infrastructure Contributions Plan, will compromise the ability to deliver residential development at an affordable market rate.

*In summary, this submission seeks a review of the overall road network design and the Transport infrastructure within the draft Infrastructure Contributions Plan with the view to provide greater efficiencies and reduce the infrastructure burden on the precinct.*



## Staging Plan and Implementation

The Planning Scheme Amendment does not currently propose to apply the Specific Controls Overlay, as was omitted in Officer South PSP following the recommendation of the Standing Advisory Committee Referral 8 Report. It does however rely on the provisions within the draft Melton East Precinct Structure Plan and the Urban Growth Zone – Schedule 13 to implement the Infrastructure and Development Staging Plan.

We note that this is despite the recommendation and commentary within the Standing Advisory Committee Referral 8 Report, stating further empirical justification is required to demonstrate why the sequential Staging Plan is required and that it may stifle the collection of infrastructure contributions.

As such, without empirical justification to support the proposed Plan 12 – Infrastructure and Development Staging, the provisions should be removed from the draft Melton East Precinct Structure Plan.

***In summary, this submission seeks the removal of Plan 12 – Infrastructure and Development Staging from the Melton East PSP, noting there is no empirical justification for the staging boundaries and the controls provide no value above and beyond the regular sequencing and subdivision requirements and guidelines.***

**A non-standard approach must be strategically justified**

The VPA is proposing a significant departure from the standard approach in Officer South, involving a restrictive approach that prohibits development until certain key infrastructure items have been delivered. This has obvious and significant implications for progressing development in the precinct, and the collection of infrastructure contributions associated with that development which will fund essential infrastructure (discussed in detail in Chapter 6.2).

Given those significant implications, it is imperative that any proposed staging controls have a sound strategic justification, and will deliver a demonstrable net community benefit (or avoid a demonstrable community harm).

The Committee is troubled by the absence of empirical analysis that:

- demonstrates unacceptable outcomes would result if development in each stage were to start before the gateway infrastructure required for that stage was delivered
- quantifies those unacceptable outcomes
- demonstrates how the gateway infrastructure items matched to each stage will resolve those unacceptable outcomes.

Without that empirical analysis, it is difficult for the Committee to conclude with certainty that the VPA's proposed staging approach will deliver a net community benefit, and impossible to quantify that benefit.

## Standing Advisory Committee Referral 8 Report

For these reasons, the Committee cannot support the Staging Plan in the form proposed by the VPA.

### (iv) Conclusions and recommendation

The Committee concludes:

- The Staging Plan in the form proposed by the VPA is inappropriate and should not be supported.
- There is no justification to apply the Specific Controls Overlay.

The Committee recommends:

### General recommendation

**Do not apply the Specific Controls Overlay to any land in the precinct.**

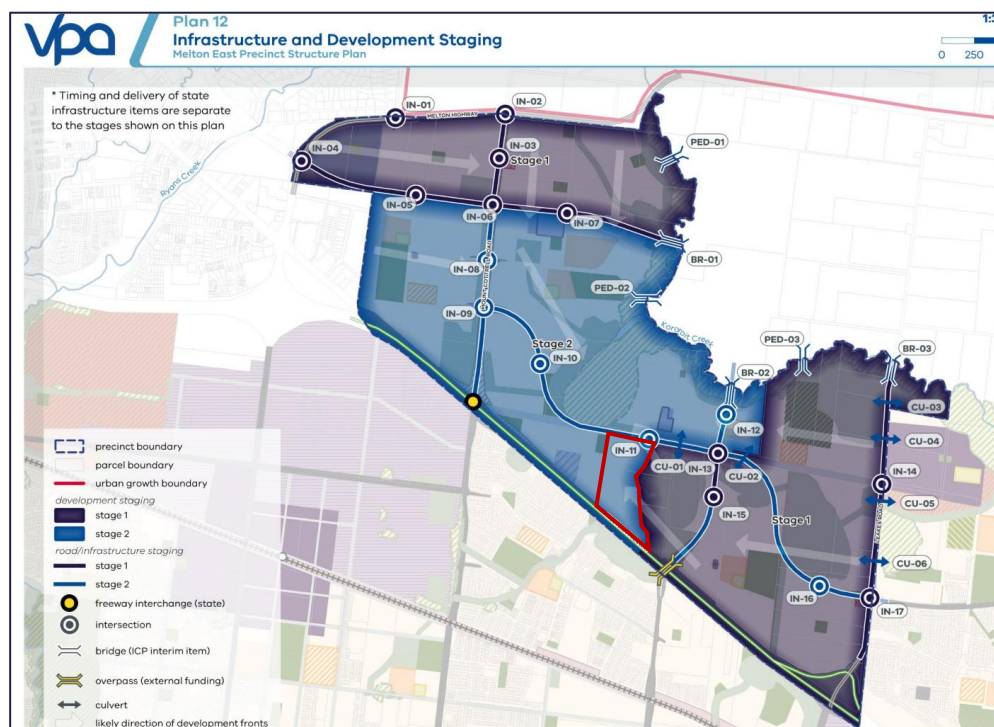
## Recommendation

In the circumstance the Victorian Planning Authority wish to persist with this inclusion and/or Panel recommend for Plan 12 – Infrastructure and Development Staging to be maintained within the PSP, we note that part of the subject land (2-32 Paynes Road, Grangefields, and 34-64 Paynes Road, Grangefields) is within Stage 1 and part of the subject land is within Stage 2. The part of the land within Stage 1 is required for the delivery of drainage infrastructure to service the catchment. In order for this drainage land to be made available to deliver the ultimate drainage infrastructure, the subdivision of the land is required and should be encouraged as early as possible.

As such, in order to ensure this land is made available in a timely manner, we recommend the Stage 1 boundary to be expanded to the western property boundary of the subject and the western property boundary of the land to the south (66-114 Paynes Road, Grangefields) should the controls be maintained as part of the PSP.

This will ensure that urban development of these landholdings will be considered appropriate as part of Stage 1, making the land available for the delivery of the ultimate drainage infrastructure.

***In summary, this submission seeks an expansion of the Stage 1 boundary to the west of 2-32 Paynes Road, Grangefields, 34-64 Paynes Road, Grangefields and 66-114 Paynes Road, Grangefields – in order to ensure the land for the ultimate drainage infrastructure is provided in a timely manner as part of the future subdivision (in the circumstances that the Staging controls are maintained within the PSP).***



Plan 12 – Infrastructure and Development Staging Plan

### Density Expectations

The draft Melton East Precinct Structure Plan has an anticipated population of 40,015 future residents and an anticipated dwelling yield of 12,908 homes. This is driven by the density expectations outlined in Table 3 and 5 of the PSP.

Plan 3 – Housing of the draft Melton East PSP designates residential land within the precinct as Amenity Area (High Density), Amenity Area (Standard) and residential Balance areas. There is various density expectations for these areas as outlined below.

HOUSING CATCHMENT AREA	NDA (HA)	DWELLINGS/NDHA	NO. OF DWELLINGS
Amenity area (High density)	110	40	4405
Amenity area (Standard)	98	30	2,952
Balance area	267	20	5,332
Town Centre	5	40	218
<b>TOTAL</b>	<b>481</b>	<b>26.9</b>	<b>12,908</b>
<b>Anticipated population at 3.1persons per dwelling</b>			<b>40,015</b>

Table 5 - Densities

The subject site is located partly within all three Housing Catchment Areas. Of particular concern is the expectations for the Amenity Area (High Density) – 40 dwellings per net developable hectare.

We note that the density expectations exceed the targets outline in the Victorian Planning Authority Precinct Structure Plan Guidelines (2021) and question whether the lack of developable area within the precinct has driven the increased densities to achieve population/yield targets of the draft Melton East PSP.

Whilst we support the amenity driven approach and the general encouragement of medium density housing within the PSP, we have particular concern for the viability and product typology that will be required for the Amenity Area (High Density) – 40 dwellings per net developable hectare. In our view, the PSP is creating an unachievable minimum requirement that will rely on apartments within the walkable catchments to the Local Town Centres that are often not feasible and attractive to the current market without associated rail transport infrastructure. This will result in Superlots being created at the planning applications stage, that are potentially never activated due to the density expectations and market demand for this typology.

Furthermore, we question the ability to achieve an acceptable subdivision design response at 40 dwellings per net developable hectare utilising conventional and Small Lot Housing Code product whilst navigating the design challenges of Council, including the suitable location of Small Lot Housing Code dwellings, appropriate lot widths, garage dominance within the streetscape, provision for street trees and/or laneways that do not create T's or L's.

In addition, we note the abundance of Arterial Roads and Drainage Infrastructure within the draft Melton East PSP and the typical requirements for internal loop roads, which will further utilise 'developable area' and skew the density calculations for respective future subdivision designs.

As such, we recommend that the density provisions within the draft Melton East PSP are re-aligned, consistent with the targets identified in the Victorian Planning Authority Precinct Structure Plan Guidelines (2021). This would result in the High Density Amenity Area to require the same density standards as the Standard Amenity Area – 30 dwellings per net developable hectare or more.

*In summary, this submission seeks the amalgamation of the High Density Amenity Areas and Standard Density Amenity Area into a single designation – 'Amenity Area' requiring a density target of 30 dwellings per net developable area.*

PSP Targets	
<b>T1</b>	The PSP should facilitate increased densities with an average of 30 dwellings or more per Net Developable Hectare (NDHA) within: <ul style="list-style-type: none"> <li>400m walkable catchment of an activity centre or train station</li> <li>50m of open space, (both credited and encumbered open space), boulevards and major public transport routes, including but not limited to the Principal Public Transport Network (PPTN) or similar.</li> </ul> Relevant VPP: <a href="#">Clause 56.04-1</a>
<b>T2</b>	The PSP should facilitate increased densities with an average of 30 dwellings or more per NDHA across the entire PSP area. Relevant VPP: <a href="#">Clause 11.03-25</a>
<b>T3</b>	The PSP should facilitate increased housing diversity, with at least three distinct housing typologies to be included in higher density areas (defined by T1). Relevant VPP: <a href="#">Clause 11.03-25</a> Reference: <a href="#">Plan Melbourne, Policy 2.5.2</a>
<b>T4</b>	Set a minimum target for provision of affordable housing in accordance with affordable housing policy, evidence, and guidance.

PSP Guidelines – Density



## Social and Affordable Housing

Whilst we support the intention to facilitate the delivery of social and affordable housing, we seek clarification on how the measures are to be implemented as part of project delivery within the Melton East precinct and how the contribution percentage was determined.

We note the social and affordable housing provisions are generally captured by the Planning Scheme Amendment as follow:

- Objective 5 of the draft Melton East PSP – ‘To facilitate 12% affordable housing.’
- Guidelines 3-5 of the draft Melton East PSO.
- The Target Typologies description in Table 3 – Housing Density and Diversity.
- Table 4 – Affordable Housing Delivery Guidance within the draft Melton East PSP.

<b>G3</b>	Residential subdivision and development that contributes to meeting the 12% affordable housing target is encouraged.
<b>G4</b>	Affordable housing products should be located in high amenity areas close to services and community facilities and provide for a range of housing typologies to meet demonstrated local needs generally in accordance with Table 3 Housing density and diversity.
<b>G5</b>	Where affordable housing is provided, consideration should be given to meeting the needs of different income ranges and household sizes generally in accordance with Table 4 Affordable housing delivery guidance.

Guidelines 3-5

- The Urban Growth Zone – Schedule 13 - Application requirements requiring as follows: *A written statement outlining how the proposal will contribute to the delivery of affordable housing in the precinct, including any proposed delivery mechanisms.*
- The Urban Growth Zone – Schedule 13 – Decision Guidelines as follows:

### Affordable housing

Before deciding on an application to develop or subdivide land for dwellings, the responsible authority must consider, as appropriate:

- Whether the proposed subdivision application contributes towards the provision of affordable housing;
- The ministerial Notice under 3AA(2) of the Act, as amended from time to time.

### Decision Guidelines

With the already significant contributions burden of development within the precinct, we are concerned that the infrastructure costs will prevent affordable housing provisions from being realised.

Furthermore, clarification is requested to determine if this is a mandatory requirement of development within the precinct, and if so, how this will be facilitated as part of the future planning application process (i.e. mandatory affordable housing financial contribution for all developments or alternative provisions negotiated with Council).

This clarity is not only critical for developers within the precinct, but for Council statutory planners implementing the PSP

*In summary, this submission seeks further clarity on the Social and Affordable Housing provisions forming part of Amendment C244melt and the expectations for future development.*

	Affordable housing	
% of total dwellings	12%	
	Subsidised Market Housing	Social Housing
% of total dwellings	2%	9%
Income Band	% of subsidised market housing by income band	% of social housing by income band
Very low	0%	69%
Low	0%	28%
Moderate	100%	3%
Housing Type	% of subsidised market housing by number of bedrooms	% of social housing by number of bedrooms
1-bedroom	46%	52%
2-bedroom	18%	16%
3-bedroom	18%	17%
4+ bedrooms	18%	15%

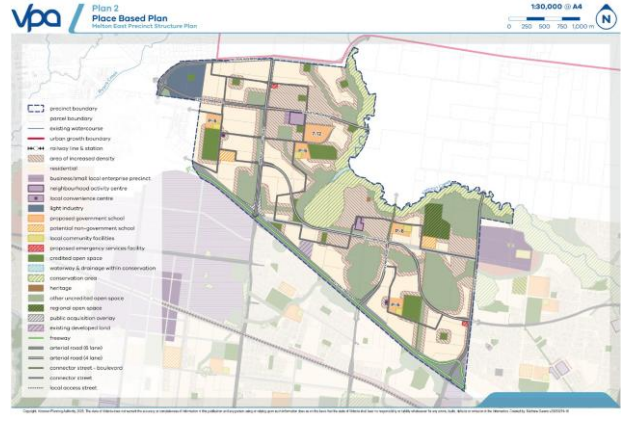

Table 5. Dwelling yields

HOUSING CATCHMENT AREA	NDA (HA)	DWELLINGS/NDHA	NO. OF DWELLINGS
Amenity area (High density)	110	40	4405
Amenity area (Standard)	98	30	2,952
Balance area	267	20	5,332
Town Centre	5	40	218
<b>TOTAL</b>	<b>481</b>	<b>26.9</b>	<b>12,908</b>
Anticipated population at 3.1 persons per dwelling			40,015

Table 4 - Densities Affordable Housing Delivery Guidance



**Specific PSP Plans, Objectives, Requirements, Guidelines, Appendices and Urban Growth Zone - Schedule 13**

A thorough review of the draft Melton East Precinct Structure Plan has been undertaken, along with the Planning Scheme Ordinance and we provide the following submissions in addition to the matters outlined above:

Draft Melton East Precinct Structure Plan	Submission
	<p>Plan 2 – Place Based Plan: It is recommended for the Place Based Plan to be refined in accordance with the matters raised in the body of this submission (i.e. reduced drainage encumbrances and refinements to the road network/Transport Infrastructure Projects).</p>
<p><b>O3</b> To provide higher density development within walkable catchments to areas of high amenity, including around key destinations such as activity centres, open space, and active and public transport networks</p> <p>R1, R2, G1</p>	<p>As per the body of our submission, it is recommended to amalgamate the Amenity Area (High Density) and Amenity Area (Standard). Therefore, in order for the vocabulary to remain consistent and clear, it is recommended to delete the word ‘high’ from the objection below to clearly apply to the submitted ‘Amenity Areas.’ Refinements recommended below:</p> <p><i>To provide higher density development within walkable catchments to areas of high amenity, including around key destinations such as activity centres, open space, and active and public transport networks</i></p>
<p><b>R4</b> Lots with frontage widths of less than 10.5 metres must be rear loaded, unless the layout ensures the provision of canopy street trees, streetscape shading, servicing, infrastructure and on-street car parking to the satisfaction of the responsible authority.</p>	<p>It is recommended to delete requirement 4 from the draft Melton East PSP. Whilst the requirement provides discretion, there are already applicable requirements and guidelines to manage the streetscape requirements including canopy street trees and on-street car parking. The inclusion of this requirement will stifle the ability to provide an affordable and popular front loaded 8.5m product. Council is likely to limit the acceptance of this product as part of future subdivision design and as such, it is recommended to rely on the additional requirements and guidelines within the PSP to control streetscape outcome.</p>
	<p>Plan 3 – Housing: As per the body of our submission, it is recommended to amalgamate the High Density Amenity Areas and Standard Density Amenity Area into a single designation – ‘Amenity Area’ requiring a density target of 30 dwellings per net developable area - consistent with the targets identified in the Victorian Planning Authority Precinct Structure Plan Guidelines (2021).</p>



<p><b>G4</b> Affordable housing products should be located in high amenity areas close to services and community facilities and provide for a range of housing typologies to meet demonstrated local needs generally in accordance with Table 3 Housing density and diversity.</p>	<p>As per the body of our submission, it is recommended to amalgamate the Amenity Area (High Density) and Amenity Area (Standard). Therefore, in order for the vocabulary to remain consistent and clear, it is recommended to delete the word 'high' from the guideline below to clearly apply to the submitted 'Amenity Areas.' Refinements recommended below:</p> <p><i>Affordable housing products should be located in <del>high</del> amenity areas close to services and community facilities and provide for a range of housing typologies to meet demonstrated local needs generally in accordance with Table 3 Housing density and diversity.</i></p>
<p><b>R11</b> Vehicular access to lots fronting arterial roads must be from service roads, internal loop roads and/or rear laneways. Service roads and internal loop roads must provide indented parking lanes to cater for on street parking.</p>	<p>It is not considered necessary for internal loop roads and some service roads to provide indented car parking. Particularly internal loop roads can traditionally provide for the car parking requirements within the 7.3m carriageway and still allow two vehicle passing movements. Mandating indented parking bays would require a wider cross section and further place infrastructure burden on a precinct which is lacking functional 'developable area.'</p> <p>As such, it is recommended to refine requirement 11 as follows:</p> <p><i>Vehicular access to lots fronting arterial roads must be from service roads, internal loop roads and/or rear laneways. <del>Service roads and internal loop roads must provide indented parking lanes to cater for on street parking.</del></i></p>
<p><b>G11</b> Direct vehicle access to lots from connector roads should be minimised through:</p> <ul style="list-style-type: none"> <li>• Rear loaded lots with laneway access</li> <li>• Vehicle access from side streets</li> <li>• Restricting direct access to residential lots from connector roads.</li> </ul>	<p>Noting the density expectation of the draft Melton East PSP, encouraging the limitation of residential allotments access to connector roads would require additional road infrastructure burden on development and further impact the ability to achieve the nominated densities. As such, it is recommended to delete this guideline from the PSP.</p>
<p><b>G12</b> Laneway design and layout should:</p> <ul style="list-style-type: none"> <li>• Provide a laneway length between 50 metres to 80 metres</li> <li>• Service a maximum of 8 to 10 dwellings per side</li> <li>• Provide good passive surveillance into, along and through the laneway</li> <li>• For laneways longer than 70 metres in length or L or T style arrangements, ensure passive surveillance is provided to the laneway via direct line of view from a habitable room on an adjoining rear loaded dwelling</li> </ul>	<p>Noting the density expectation of the draft Melton East PSP, the guideline regarding laneway designs and layouts may limit the ability to provide innovative design solutions in order to achieve the density requirements. As such, it is recommended to delete this guideline from the PSP.</p>
<p><b>R22</b> Canopy tree coverage within the public realm must achieve a minimum of 30% coverage (excluding areas dedicated to biodiversity, native vegetation conservation, and drainage assets).</p>	<p>Noting the density expectation of the draft Melton East PSP, it may be unachievable in some urban locations such as directly adjoining the Local Town Centres to achieve the mandated 30%. As such it is recommended for requirement 22 to be provided as a guideline within the PSP.</p>
<p><b>R39</b> Stormwater infrastructure within or adjacent to the BCS conservation area or retained wetlands (pre-European) must be designed to use treated stormwater to achieve the hydrological requirements of retained wetlands (pre-European) and Growing Grass Frog habitat wetlands, unless otherwise agreed to by the DEECA.</p>	<p>As per the body of our submission, the currently retained wetlands (pre-European) should be removed from the PSP to maximise the Drainage Strategy design. As such, it is recommended to delete requirement 39.</p>
<p><b>G15</b> Vegetation identified in Plan 8 Native Vegetation Retention &amp; Removal as 'can be removed' should be retained where possible along streets and in subdivisions, as identified in the <i>Melton East PSP Arboricultural Report</i> (Tree Logic, July 2022).</p>	<p>It is noted that the Schedule to Clause 52.17 does not provide this vegetation any planning protection and the trees may be removed outside the planning application process. As such, it is submitted to delete guideline 15.</p>

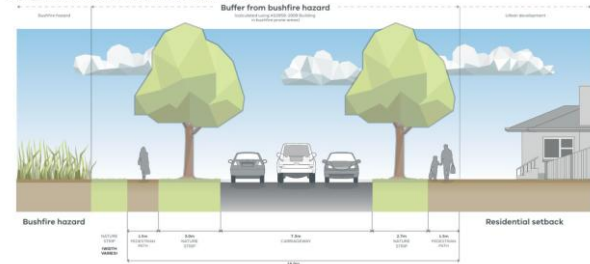
<p><b>G16</b></p> <p>Canopy trees should have an average canopy foliage of 6.4m in diameter at maturity in summer or as specified in relevant Melton City Council landscaping and tree policies. Where this cannot be achieved because of local climate and soil conditions, a suitable species should be selected which closest achieves this canopy cover, to the satisfaction of the responsible authority. The requirement for a minimum 30% canopy tree coverage within the public realm must still be met.</p>	<p>It is noted that there are separate requirements and guidelines associated with tree species selection to the satisfaction of the Responsible Authority and tree canopy targets. As such, this guideline is superfluous, and it is submitted to delete guideline 16.</p>
<p><b>G17</b></p> <p>The design of subdivision and development should facilitate the retention of existing canopy trees to contribute to the 30% canopy tree cover target where practical.</p>	<p>As previously noted, the Schedule to Clause 52.17 does not provide vegetation protection unless nominated for retention. Therefore, the existing canopy trees referenced may not be afforded any planning protection and the trees may be removed outside the planning application process. As such, it is submitted to delete guideline 17.</p>
<p><b>G32</b></p> <p>Where a Cultural Heritage Management Plan is required, it should include recommendations for the ongoing preservation, restoration, management and maintenance of waterways and water landscapes. Any such ongoing management and maintenance requirements should be considered for inclusion as an appropriately worded condition on a relevant planning permit.</p>	<p>The preparation of the Cultural Heritage Management Plan and the <i>Aboriginal Heritage Act 2006</i> and the associated Regulations will ensure this is addressed prior to any planning permit being issued. As such, it is recommended to delete Guidelines 32.</p>
<p><b>G33</b></p> <p>A voluntary Cultural Heritage Management Plan should be undertaken in the following locations if a high impact activity is undertaken, as listed in Division 5 of the <i>Aboriginal Heritage Regulations 2018</i>:</p> <ul style="list-style-type: none"> <li>Land identified as a potential rise area on Plan 10 – Aboriginal Cultural Values</li> <li>Land identified as rock outcrops/exposed rock on Plan 10 – Aboriginal Cultural Values</li> <li>Land identified as moderate, moderate-high and high predicted archaeological sensitivity in Appendix 9 Predicted Aboriginal Archaeological Sensitivity.</li> </ul>	<p>Given the nomination as voluntary, it is recommended to delete guideline 33 from the draft Melton East PSP and rely on the <i>Aboriginal Heritage Act 2006</i> and the <i>Aboriginal Heritage Regulations 2018</i>.</p>
<p><b>G34</b></p> <p>Development should recognise and respond to Aboriginal Cultural Heritage significance through:</p> <ul style="list-style-type: none"> <li>Protection of River Red Gums and remnant endemic vegetation within waterways and water landscapes and drainage areas shown on Plan 10 – Aboriginal Cultural Values</li> <li>Protection and incorporation of view lines shown on Plan 10 – Aboriginal Cultural Values</li> <li>Incorporation of natural landscape features into the open space network such as potential rise areas, rock outcrops and waterways and water landscapes shown on Plan 10 – Aboriginal Cultural Values</li> <li>Incorporation of interpretative signage at significant locations in development in consultation with the Wurundjeri Woi-wurrung Cultural Heritage Aboriginal Corporation.</li> <li>Use of Wurundjeri Woi-wurrung place names in consultation with the Wurundjeri Woi-wurrung Cultural Heritage Aboriginal Corporation.</li> </ul>	<p>The preparation of the Cultural Heritage Management Plan and the <i>Aboriginal Heritage Act 2006</i> and the associated Regulations will ensure this is addressed prior to any planning permit being issued. As such, it is recommended to delete Guidelines 34.</p>
<p> <b>Strengthened community knowledge and local values reflected in place-based planning</b></p> <ul style="list-style-type: none"> <li>Incorporate indigenous cultural heritage (through wetlands and waterways) (WWWACHC, Melbourne Water)</li> <li>Maximise multiple benefits (community and ecological) at western and eastern depressions (Melbourne Water, responsible authority)</li> </ul>	<p>We note the Integrated Water Management Strategic Outcomes and recommend for the first dot point of ‘Strengthened Community Knowledge and Local Values Reflected in Place Based Planning’ be refined as below in order to allow for the preparation of the Cultural Heritage Management Plan and the <i>Aboriginal Heritage Act 2006</i> and the associated Regulations to address the specific outcomes:</p> <p><i>Incorporate indigenous cultural heritage <del>(through wetlands and waterways)</del> (WWWACHC, Melbourne Water).</i></p>
	<p>Plan 8 – Native Vegetation Retention and Removal: As per the body of our submission, the precinct is located within the Melbourne Strategic Assessment area.</p> <p>Tree 355 is a <i>Eucalyptus Botryoides</i> with Moderate C value and Tree 356 is a <i>Eucalyptus Cladocalyx</i> with Moderate A value. Both are native species.</p> <p>It is recommended for the vegetation nominated for retention within the subject site to be removed from the PSP, as per the intent of the MSA Program and Environmental Mitigation Levy.</p>





**Bushfire hazard buffer treatment – Local Access Street Level 1**

Using perimeter roads to deliver bushfire protection in new subdivisions

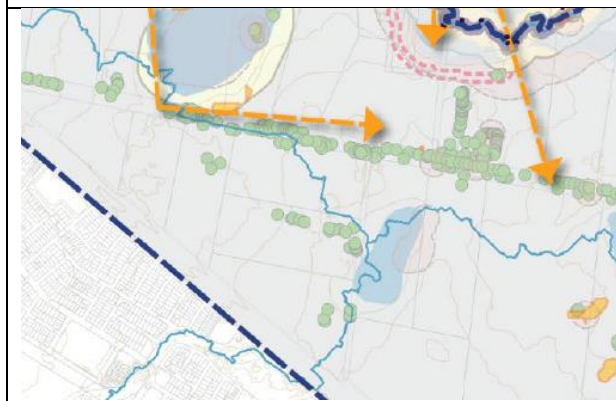


We note the defendable space requirements of Plan 9 – Bushfire and the 19m Bushfire Hazard A setback applying to the interface to the drainage infrastructure at the subject site.

We are seeking independent advice in regards to the hazard designation to determine whether a low threat environment would be more appropriate for the drainage infrastructure interface.

Nevertheless, it is requested that the cross section include a notation to more clearly demonstrate that the defendable space is required between the encumbered open space/drainage reserve boundary and the dwelling built form.

As such, allowing for the front setbacks and yards of dwellings to provide for this defendable space setback as long as controls are in place to ensure the entire defendable space is provided between the building line and the open space/drainage reserve boundary.



Plan 10 – Aboriginal Cultural Values: We question the appropriateness of designating the potential ephemeral stream within the PSP without a definitive confirmation that this is in fact an ephemeral stream.

As such, it is recommended to delete this reference from Plan 10.

Furthermore, we are seeking our own independent advice on the appropriateness of designating the Paynes Road water body as a pre-European wetland and reserve the right to make further submissions on this basis.

**R62** Staging of infrastructure and development must be generally in accordance with Plan 12 Infrastructure and Development Staging and Appendix 1 Plan 13 Precinct Infrastructure Plan, and must provide for the timely provision and delivery of infrastructure to the satisfaction of the responsible authority

We note our submission above to delete Plan 12 Infrastructure and Development Staging due to the lack of empirical justification. As such, it is recommended to delete requirement 62.

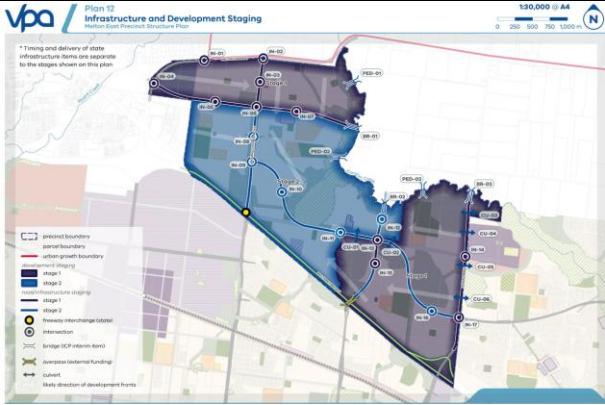

**R63** Infrastructure and development staging must provide for the delivery of ultimate waterway and drainage infrastructure, including stormwater quality treatment, and consider opportunities for early establishment of waterways to the satisfaction of Melbourne Water and the responsible authority.

Where it can be demonstrated to the satisfaction of Melbourne Water that this is not possible, staged development proposals must demonstrate how any interim solution adequately manages flow rates and flow volume, treats stormwater generated from the development and how this will enable delivery of an ultimate drainage solution, to the satisfaction of water authority/retailer and the responsible authority. Development construction staging and interim solutions must avoid or mitigate the risk of soil erosion and water and waterway degradation from sodic and/or dispersive soils.

Whilst we appreciate the intention to require the timely delivery of ultimate infrastructure, this is sometimes unachievable due to land access limitations. As such, we do not consider the phrasing of must within a requirement of the PSP to be appropriate given the alternative scenario in paragraph 2 where interim drainage can be considered.

As such, it is recommended for requirement 63 to be amended to a guideline and re-phrased as follows:

*Infrastructure and development staging ~~must~~ should provide for the delivery of ultimate waterway and drainage infrastructure, including stormwater quality treatment, and consider opportunities for early establishment of waterways to the satisfaction of Melbourne Water and the responsible authority.*

	<p>Where it <del>can be demonstrated to the satisfaction of Melbourne Water that this is not possible</del>, staged development proposals <del>must</del> <u>should</u> demonstrate how any interim solution adequately manages flow rates and flow volume, treats stormwater generated from the development and how this will enable delivery of an ultimate drainage solution, to the satisfaction of water authority/retailer and the responsible authority. Development construction staging and interim solutions must avoid or mitigate the risk of soil erosion and water and waterway degradation from sodic and/or dispersive soils.</p>
<p><b>R68</b> Drainage from stormwater infrastructure must be designed to minimise impacts on biodiversity values, particularly habitat for matters of national environmental significance located within conservation areas.</p>	<p>As per the body of our submission, the Melton East precinct is located within the Melbourne Strategic Assessment area, and only native vegetation within the Conservation Areas should be protected in accordance with the Biodiversity Conservation Strategy. As such, it is recommended to refine to requirement 66 as follows to provide greater clarity:</p> <p><i>Drainage from stormwater infrastructure <u>within Conservation Areas</u> must be designed to minimise impacts on biodiversity values, particularly habitat for matters of national environmental significance <del>located within conservation areas</del>.</i></p>
<p><b>R69</b> Utilities and other infrastructure must avoid traversing patches of native vegetation and habitat for matters of national environmental significance.</p>	<p>As per the body of our submission, the Melton East precinct is located within the Melbourne Strategic Assessment area, and only native vegetation within the Conservation Areas should be protected in accordance with the Biodiversity Conservation Strategy. As such, it is recommended to delete requirement 69.</p>
 <p>The map, titled 'Plan 12 Infrastructure and Development Staging', shows a large area with various infrastructure elements and development stages. It includes a legend with symbols for: selected boundary, parcel boundary, urban growth boundary, road network, stage 1, stage 2, infrastructure staging, stage 1, stage 2, existing interchange layout, intersection, for bridge (CP future lane), overpass (future funding), culvert, and study direction of development fronts. The map also includes a scale bar (0 to 1000m) and a north arrow.</p>	<p>We note our submission above to delete Plan 12 Infrastructure and Development Staging due to the lack of empirical justification.</p>
 <p>The diagram shows a cross-section of a road with four lanes. It includes a central median, two lanes in each direction, and a wide shoulder. The diagram also shows trees, a sidewalk, and a road reserve. The road is labeled 'Primary Arterial 4 Lane (34)'.</p>	<p>Appendix 5 – Primary Arterial 4 Lane (34) cross section: We note the cross section for Taylors Road at the frontage of the subject site that is aligned to continue within the existing Beattys Road road reservation of approximately 60m in width.</p> <p>We also note the Conceptual Design of Taylors Road and IN-11 supporting the Infrastructure Contributions Plan and that the intersection/road design is not central to the existing Beattys Road road reservation.</p> <p>This outcome limits the ability to allow the adjoining loop roads to be provided within the existing Beattys Road road reservation as per guideline 28 of the PSP.</p>





Clarification is requested in order to confirm that Taylors Road and IN-11 may be shifted centrally within the existing road reservation to allow opportunities for development on both sides of the road reservation to utilise the surplus land.

This is of particular importance to the subject site, noting the surplus land is identified to the north of Taylors Road, which adjoins the drainage corridor. Therefore, the surplus land is unable to be utilised in this circumstance.

Whilst we recognise guideline 28 provides some commentary regarding this outcome, we submit this should also be reflected in the cross sections within the PSP via notations.

We further note the page 81 Plan View of this cross section is incorrect and includes on-road bike lanes, contrary to the cross section on page 80.

Appendix 9 - Noting the submissions to delete guideline 33 and guideline 34, we question the value of Plan 17 – Predicted Aboriginal Archaeological Sensitivity Mapping given the *Aboriginal Heritage Act 2006* and the associated Regulations directly address Aboriginal Cultural Heritage.

As such, it is submitted to delete Appendix 9 from the draft Melton East PSP.

## Urban Growth Zone – Schedule 13

## Submission

### Section 2.2 – Applied Zones

Noting the density expectations applied to the precinct as a whole, regardless of the 'Amenity Areas' it is submitted that all residential land should be zoned Applied Residential Growth Zone.

### Clause 3 – Application Requirements

#### Environmentally sustainable development

An application for the development of land must be accompanied by a Sustainable Design Assessment report or a Sustainability Management Plan prepared by a suitably qualified professional that demonstrates how the development will achieve best practice sustainable design. This includes encouraging energy performance, integrated water management, indoor environment quality, transport, waste management and urban ecology. Best practice environmental

Whilst we do not oppose the application of Environmentally Sustainable Development initiatives into the Planning Scheme and development process, it provides problematic assessment frameworks at the planning application phase without clear minimum benchmark/expectations to be achieved.

It is recommended that clearer benchmarks/expectations are outlined within these provisions to provide clarity for development outcomes and Council statutory planners.

<p>design for the development can use the Built Environment Sustainability Scorecard (BESS) or other comparable sustainable design tool.</p> <p>The sustainable design assessment (including an assessment using BESS, STORM or other methods) should consider as relevant to the below:</p> <p>Residential</p> <ul style="list-style-type: none"> <li>• 2-9 dwellings.</li> <li>• A building used for accommodation other than dwellings with a gross floor area between 100 square metres and 1000 square metres.</li> </ul> <p>Non-residential</p> <ul style="list-style-type: none"> <li>• A non-residential building with a gross floor area of 300 square metres to 1000 square metres.</li> <li>• An extension to an existing non-residential building creating between 300 square metres to 1000 square metres of additional gross floor area (excluding outbuildings).</li> </ul> <p>The Sustainability Management Plan (including an assessment using BESS/Green star, STORM/MUSIC or other methods) and a green travel plan should be applicable to the below:</p> <p>Residential</p> <ul style="list-style-type: none"> <li>• 10 or more dwellings.</li> <li>• A building used for accommodation other than dwellings with a gross floor area of more than 1000 square metres.</li> </ul> <p>Non-residential</p> <ul style="list-style-type: none"> <li>• A non-residential building with a gross floor area of more than 1000 square metres.</li> <li>• An extension to an existing non-residential building creating more than 1000 square metres of additional gross floor area (excluding outbuildings).</li> </ul> <p>Mixed use</p> <p>Applicable assessments for the residential and non-residential components of the development.</p>	
<p>Shared Path Network Plan</p> <p>An application to subdivide land, construct a building or construct or carry out works on land that adjoins existing or future primary or secondary arterial road, being Tarletons Road, Mount Cottrell Road, Taylors Road, Paynes Road, Leakes Road shown on Plan 1 of this Schedule must be accompanied by a Shared Path Network Plan.</p>	<p>Whilst we can appreciate the transport network not only should provide for vehicle access and connectivity, but for alternative modes of active transport, the application requirements should be made clearer to specify a distance in which these existing activity nodes should be measured.</p> <p>As currently drafted, the requirement is ambiguous as how far this plan should extent and what would be considered relevant.</p>

<p>The Shared Path Network Plan must respond to the Place Based Plan, Infrastructure and Development Staging Plan, and ICP PIP Table and identify the direction and distances to existing activity nodes, including local employment centres, community centres, primary and secondary schools, community infrastructure and/or a major public transport hub such as a railway station or bus interchange, and:</p> <ul style="list-style-type: none"> <li>Identify the existing pedestrian, bicycle and/or shared path network connections along these roads.</li> <li>Identify any sections of the pedestrian, bicycle and/or shared path network along these roads that is not constructed that would provide continual access to existing activity nodes.</li> <li>Identify the relevant ICP items required to be delivered in full or in part to ensure continuous connections to activity nodes are provided.</li> </ul>	<p>It is submitted that this plan should be confined to activity nodes within 400m walkable catchment of the subject site.</p>
<p>Acoustic Assessment Report</p> <p>Any application for use, subdivision or development of land for Accommodation, Education centre (other than Tertiary institution and Employment training centre) or Hospital within a noise influence area shown on Plan 15 Noise Influence Areas of the Melton East Precinct Structure Plan, must be accompanied by an acoustic assessment report prepared by a qualified acoustic engineer or other suitably skilled person to the satisfaction of the responsible authority which:</p> <ul style="list-style-type: none"> <li>Applies the following noise objectives:</li> </ul> <ul style="list-style-type: none"> <li>- Not greater than 35 dB LAeq,8h when measured within a sleeping area between 10pm and 6am.</li> <li>- Not greater than 40 dB LAeq,16h when measured within a living area between 6am and 10pm.</li> <li>- For areas other than sleeping and living areas, not greater than the median value of the range of recommended designed sound levels.</li> </ul> <ul style="list-style-type: none"> <li>Noise levels should be assessed:</li> </ul> <ul style="list-style-type: none"> <li>- Considering the cumulative noise from all sources impacting on the proposal including existing and likely future road traffic noise, industry noise and other potential noise sources; and</li> <li>- In unfurnished rooms with a finished floor and the windows closed and be based on average external noise levels measured as part of a noise level assessment.</li> </ul> <ul style="list-style-type: none"> <li>Identifies lots and/or buildings requiring mitigation from noise from all sources impacting on the proposal, including road traffic noise and industry noise. If lots and/or buildings requiring acoustic mitigation are identified, the report should include</li> </ul>	<p>We are seeking independent advice as to whether the provisions suggested are consistent with the Environment Protection Regulations under the <i>Environment Protection Act 2017</i> and the Noise Limit and Assessment Protocol for the Control of Noise from Commercial, Industrial and Trade Premises and Entertainment Venues (Publication 1826, Environment Protection Authority, May 2021).</p> <p>Nevertheless, we recommend the provisions are simplified to require an Acoustic Assessment to address the provisions of Clause 13.05-1S. This will ensure the requirements are consistent with State and Industry Standards.</p>



<p>recommendations for any noise attenuation measures required to meet the applicable noise level objectives. These recommendations should prioritise measures that benefit both outdoor and indoor spaces, and should address:</p> <ul style="list-style-type: none"> <li>- Noise compatible design for buildings, with siting, orientation, and internal layout, to be considered prior to setting building envelope performance requirements.</li> <li>- Potential noise character (tonality, impulsiveness or intermittency);</li> <li>- Noise with high energy in the low frequency range;</li> <li>- Transient or variable noise; and</li> <li>- Vibration.</li> </ul> <p>This requirement does not apply if the permit applicant provides, to the satisfaction of the responsible authority, a statement in writing, supported by verifiable evidence, from a qualified acoustic engineer or other suitably skilled person to the satisfaction of the responsible authority that, having regard to Clause 13.05, the proposed development is not prejudiced and community amenity and human health is not adversely impacted by noise emissions, and that no noise attenuation measures are required.</p>	
<p><b>Clause 4 – Conditions and Requirements for Permits</b></p> <p>Condition – Shared Path Network</p> <p>A permit granted to subdivide land, construct a building or construct or carry out works on land that adjoins existing or future primary or secondary arterial road, being Tarletons Road, Mount Cottrell Road, Taylors Road, Paynes Road and Leakes Road, shown on Plan 1 of this Schedule, must include the following condition: Before the Statement of Compliance for the plan of subdivision is issued (or, in the case of a staged subdivision, the plan of subdivision or masterplan which implements the first stage of the subdivision), or before a building permit is issued (whichever comes first), a dedicated shared path must be constructed between the subject site and existing activity nodes, to the satisfaction of the responsible authority in accordance with the Shared Path Network Plan.</p>	<p>The intention and requirement of this condition is not clear.</p> <p>We note the Transport Infrastructure included within the draft Infrastructure Contributions Plan, including Tarletons Road, Mount Cottrell Road, Taylors Road, Paynes Road and Leakes Road – all include a shared path to be delivered as part of the Infrastructure Project.</p> <p>We request further clarification behind the intent of this condition and what is being mandated given the Activity Node definition can be subjective based on the expansion within Clause 3 – Application Requirements.</p> <p>Until the intent of this condition is made abundantly clear in the drafting and its interpretation, we submit this should be removed from the Urban Growth Zone – Schedule 13.</p>
<p><b>Clause 5 – Exemptions from Notice and Review</b></p> <p>An application for a use listed in Section 2 of the Residential Growth Zone and General Residential Zone on land where the applied zone listed at Table 1 of this schedule is Residential Growth Zone or General Residential Zone is not exempt from the notice requirements of Section 64(1), (2) and (3) and the review rights of Section 82(1) of the Act.</p>	<p>We note the exemptions Clause excluded Section 2 uses within the Residential Growth Zone and General Residential Zone. This may prevent the timely delivery of non-residential infrastructure to service the precinct, such as child care centres, medical centres etc.</p> <p>As such, it is recommended for the standard exemption applied to PSP areas if considered to be 'generally in accordance with the PSP' to</p>

	replace the currently drafted exemption that excludes Section 2 land uses.
<b>Clause 6 – Decision Guidelines</b>  Shared Path Network Whether the proposed application to subdivide land, construct a building or construct or carry out works on land that adjoins existing or future State roads, will enable safe pedestrian, bicycle and/or shared path network access to existing activity nodes, including local employment centres, community centres, primary and secondary schools, public transport and community infrastructure.	We note the Share Path Network decision guideline currently included within the draft Urban Growth Zone – Schedule 13. We request further clarification behind the intent of the condition and what is being mandated given the Activity Node definition can be subjective based on the expansion within Clause 3 – Application Requirements.  Until the intent of these requirements are made abundantly clear in the drafting and its interpretation, we submit this should be removed from the Urban Growth Zone – Schedule 13.

## Conclusion

I trust that this submission and enclosed information will assist the Victorian Planning Authority with the further consideration of the proposed Planning Scheme Amendment C244melt. We appreciate the opportunity to provide feedback at this critical phase of the project.

Beyond the matters outlined within this submission, we are supportive of the Planning Scheme Ordinance, Maps and Documentation exhibited in its current form and would appreciate being notified if there are any further consequential changes throughout the consultation process.

We look forward to continuing to work closely with the Victorian Planning Authority and State Government Agencies to refine the draft Melton East Precinct Structure Plan and Infrastructure Contributions Plan post-exhibition in an effort to resolve as many matters as possible ahead of Panel. Should the matters outlined within this submission remain unresolved and be referred to Planning Panels, we reserve the right to be heard at the Panel and make submissions.

Should you have any queries, please do not hesitate to contact me on 0409 962 001 or via email

Yours sincerely

**SPOT Planning Pty Ltd**



**Samuel Sawaya**  
Director



PLANNING SCHEME AMENDMENT C244MELT

## Appendix A      Biodiversity Conservation Strategy – Page 3

PREPARED FOR YALE ASSET DEVELOPMENT 2

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## 1.1 Purpose of the Biodiversity Conservation Strategy

The purpose of the BCS is to:

- > Inform and guide the preparation of the Growth Corridor Plans (GAA, 2012)
- > Outline how the conservation outcomes for matters of national environmental significance in the program report will be achieved spatially within the growth corridors and how impacts on these matters will be mitigated
- > Identify the land within the growth corridors that is required to be protected due to the sub-regional species strategies and the prescriptions for matters of national environmental significance
- > Identify how areas set aside for conservation will be managed
- > Outline how mitigation measures will be implemented.

## 1.2 Scope of the Biodiversity Conservation Strategy

The BCS is the overarching strategy for the protection of biodiversity in the growth corridors. It sets out all the conservation measures required for matters of national environmental significance and state significance to satisfy the commitments to the Commonwealth Government and to meet state requirements, including *Victoria's Native Vegetation Management: A Framework for Action* (Native Vegetation Management Framework) (DNRE, 2002). These conservation measures comprise:

- > The protection and management of land of high biodiversity value within defined conservation areas and areas outside the Urban Growth Boundary
- > Requirements to provide offsets for removal of native vegetation and threatened species habitat on land not required for conservation and suitable for urban development
- > Requirements to salvage and translocate certain threatened species prior to removal of habitat on land not required for conservation and suitable for urban development.

The BCS identifies 36 conservation areas within the growth corridors that will be protected and managed in perpetuity. Land not within a conservation area and suitable for urban development may be cleared of native vegetation in accordance with an approval



Photo: Button Wrinklewort, DEPI

by the Commonwealth Environment Minister under the endorsed program and subject to Victorian legal and planning processes (e.g. *Flora and Fauna Guarantee Act 1988*, *Planning and Environment Act 1987*).

The BCS has applied the requirements of the prescriptions and the Native Vegetation Management Framework (DNRE, 2002) strategically at a growth corridor level to identify conservation areas, and removes the need to protect additional land resulting from these requirements at the precinct structure planning stage, or other development approval stages.

In accordance with the program report, survey, salvage and/or translocation and offset requirements apply to land that is suitable for urban development and may be cleared of native vegetation. These requirements are set out in the BCS.

The biodiversity values of some land previously set aside for conservation under Planning Scheme Amendment VC 68 have been reassessed. Some of this land was found to be of lower biodiversity value and is not required for conservation. These areas of land have been excluded from the conservation areas and may be made available for urban development.

In accordance with the program report, the BCS addresses all matters of national environmental significance that are currently known to occur in the growth corridors and matters of state significance. The matters of national environmental significance are:

- > Commonwealth listed threatened species and ecological communities
- > Commonwealth listed migratory species
- > Wetlands of international importance.

The matters of state significance are:

- > Threatened species and ecological communities listed under the *Flora and Fauna Guarantee Act 1988*
- > Species listed on the DEPI's Rare and Threatened Species Advisory Lists.

The BCS does not require future protection of any additional land to that identified in the BCS, for matters of national environmental significance or state significance that are not currently known to occur within the growth corridors, or for new matters listed under the *Environment Protection and Biodiversity Conservation Act 1999* or the *Flora and Fauna Guarantee Act 1988*.



Photo: Large-fruit Groundsel, DEPI

The precinct structure planning stage or planning permit stage may provide opportunities to protect these matters on a voluntary basis, particularly on land unavailable for urban development (e.g. on land set aside for open space or drainage or road reserves).

Two sub-regional species strategies for Growling Grass Frog and Golden Sun Moth have been prepared to support the BCS. The requirements of these strategies are consistent with the requirements of the BCS. In the event of an inconsistency, the BCS prevails over the Growling Grass Frog and Golden Sun Moth strategies.

A third Sub-regional Species Strategy for Southern Brown Bandicoot is currently being prepared by DEPI. The strategy will focus on areas outside the area covered by the BCS. The BCS may require amendment for the south-eastern growth corridor to be consistent with any additional requirements of the strategy. The strategy requires approval from the Commonwealth Government.

The BCS does not assess the impacts of the State Government's program on matters of national environmental significance or state significance, but rather outlines how the commitments in the program report will be achieved. The assessment of the impacts of the program was undertaken by the Melbourne Strategic Assessment (see section 2.1).



PLANNING SCHEME AMENDMENT C244MELT

## Appendix B      Indicative Drainage Scheme Design

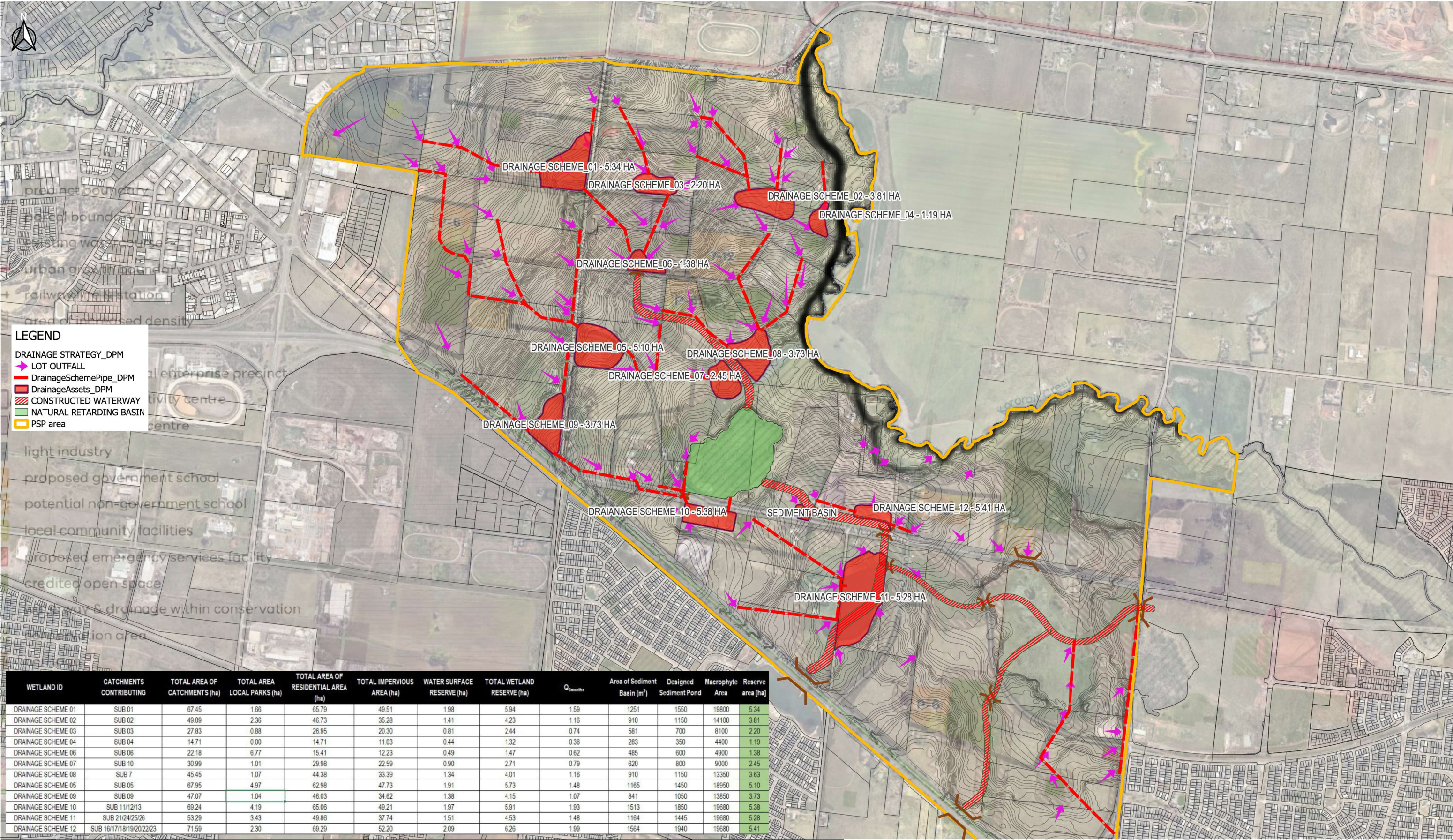
PREPARED FOR YALE ASSET DEVELOPMENT 2

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PROPOSED DRAINAGE SCHEME PLAN FOR MELTON EAST PSP




WETLAND ID	CATCHMENTS CONTRIBUTING	TOTAL AREA OF CATCHMENTS (ha)	TOTAL AREA LOCAL PARKS (ha)	TOTAL AREA OF RESIDENTIAL AREA (ha)	TOTAL IMPERVIOUS AREA (ha)	WATER SURFACE RESERVE (ha)	TOTAL WETLAND RESERVE (ha)	Q <sub>10min</sub>	Area of Sediment Basin (m <sup>2</sup> )	Designed Sediment Pond	Macrophyte Area	Reserve area [ha]
DRAINAGE SCHEME 01	SUB 01	67.45	1.66	65.79	49.51	1.98	5.94	1.59	1251	1550	19800	5.34
DRAINAGE SCHEME 02	SUB 02	49.09	2.36	46.73	35.28	1.41	4.23	1.16	910	1150	14100	3.81
DRAINAGE SCHEME 03	SUB 03	27.83	0.88	26.95	20.30	0.81	2.44	0.74	581	700	8100	2.20
DRAINAGE SCHEME 04	SUB 04	14.71	0.00	14.71	11.03	0.44	1.32	0.36	283	350	4400	1.19
DRAINAGE SCHEME 06	SUB 06	22.18	6.77	15.41	12.23	0.49	1.47	0.62	485	600	4900	1.38
DRAINAGE SCHEME 07	SUB 10	30.99	1.01	29.98	22.59	0.90	2.71	0.79	620	800	9000	2.45
DRAINAGE SCHEME 08	SUB 7	45.45	1.07	44.38	33.39	1.34	4.01	1.16	910	1150	13350	3.63
DRAINAGE SCHEME 05	SUB 05	67.95	4.97	62.98	47.73	1.91	5.73	1.48	1165	1450	18950	5.10
DRAINAGE SCHEME 09	SUB 09	47.07	1.04	46.03	34.62	1.38	4.15	1.07	841	1050	13850	3.73
DRAINAGE SCHEME 10	SUB 11/12/13	69.24	4.19	65.06	49.21	1.97	5.91	1.93	1513	1850	19680	5.38
DRAINAGE SCHEME 11	SUB 21/24/25/26	53.29	3.43	49.86	37.74	1.51	4.53	1.48	1164	1445	19680	5.28
DRAINAGE SCHEME 12	SUB 16/17/18/19/20/22/23	71.59	2.30	69.29	52.20	2.09	6.26	1.99	1564	1940	19680	5.41


DRAINAGE SCHEME - CONTEXT PLAN

PROPOSED DRAINAGE SCHEME PLAN FOR MELTON EAST PSP

Revision: P1  
Designed: ca  
Checked: DM  
Project Manager: JM  
Date: 27.03.2025



Map Projection: Tranverse Mercator  
Horizontal Datum: Geocentric Datum of Australia  
Vertical Datum: Australia Height Datum  
Grid: GDA2020, MGA 55







PLANNING SCHEME AMENDMENT C244MELT

## Appendix C      Alternative K4 Concept Design

PREPARED FOR YALE ASSET DEVELOPMENT 2

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Our Ref: JM 3261/M/C


31 March 2025


Yale Asset Development 2

General Manager  
LIVV Developments  
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 22 Business Park Drive,  
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ABN 47 006 550 803  
ACN 006 550 803

**Subject:** Proposed Planning Scheme Amendment C244melt | Functional Design Review for Wetland “WRLB 7”

**Subject Land :** 2-32 and 34-64 Paynes Road, Grangefields

Dear Marc,

DPM Consulting Group (DPM) welcomes the opportunity to provide feedback on the draft Melton East Precinct Structure Plan (PSP) currently on exhibition. We confirm our engagement to act on behalf of the landowners of 2-32 and 34-64 Paynes Road, Grangefields (subject land), and fully support the broader submission provided by Spot Planning in relation to this PSP.

The purpose of this letter is to provide a review of the functional design prepared by Alluvium for Wetland “WLRB 7” and offer design refinements an enhancement where appropriate. A copy of DPM’s proposed concept drawing for wetland “WLRB 7” is enclosed with this letter.

### Background

DPM was engaged by Yale Asset Development 2 during 2023 to undertake a Preliminary Drainage Investigation for the Melton East PSP area. As part of this work, DPM prepared a drainage scheme layout that proposed a more distributed siting of drainage assets compared to the current layout shown in the exhibited PSP. A copy of the drainage investigation was submitted to Melbourne Water on the 15<sup>th</sup> of February 2023.

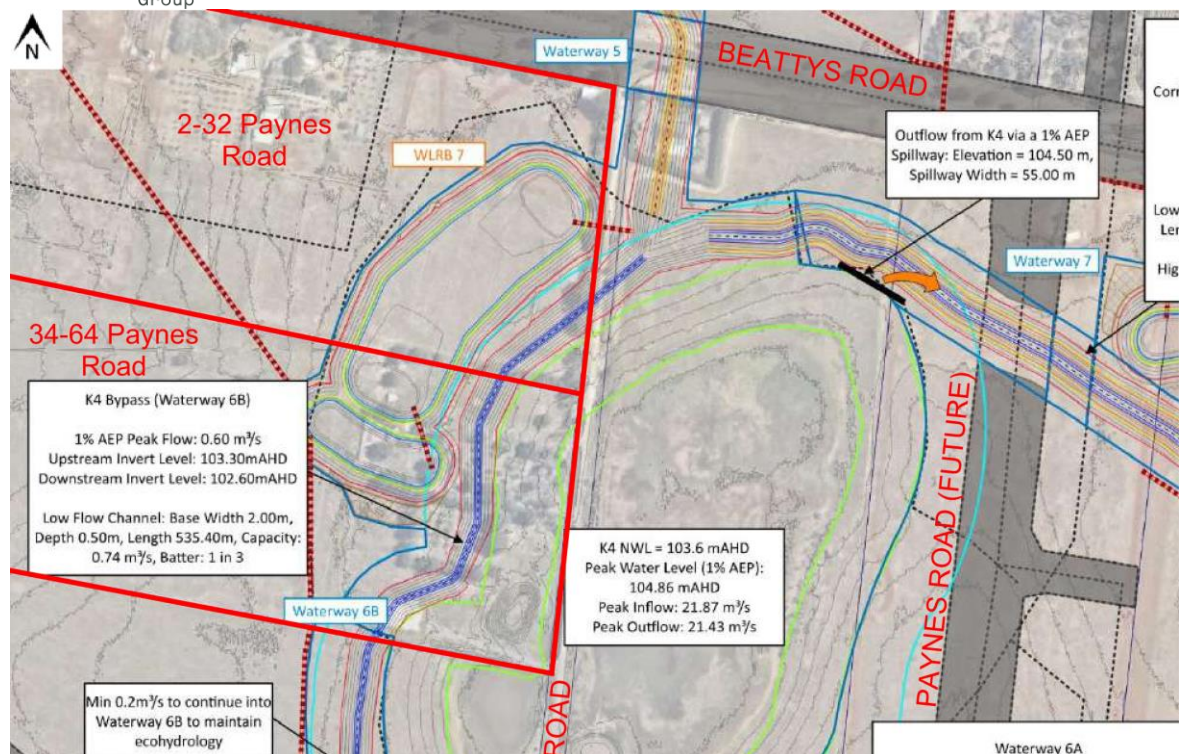
A key feature of DPM’s proposed scheme was the co-location of stormwater management infrastructure within the area mapped as Seasonal Herbaceous Wetland (SHW) “K4”. This approach aimed to maximise Net Developable Area (NDA) across the precinct by consolidating stormwater infrastructure in areas with limited development potential.

An extract of this has been provided in Figure 1 on the following page.



Following the release of the exhibited PSP and associated background reporting, DPM has reviewed its earlier design work in the context of SHW “K4” and its associated archaeological sensitivity buffers. We note that, consistent with the advice included in the Spot Planning submission, the design shown in Figure 1 remains a relevant and viable option in the event that SHW “K4” and its mapped buffers are not ultimately confirmed as protected ecological or cultural features.

We have reviewed the *Kororoit Creek Upper and High Street Melton DSS Functional Design Report* prepared by Alluvium (February 2025), with a particular focus on the proposed stormwater infrastructure referred to as Wetland Retarding Basin “WLRB 7” and the bypass channel Waterway “6B” associated with the Seasonal Herbaceous Wetland (SWH) “K4” proposed to be located on the subject land as shown in Figure 2.



**Figure 2 - Current functional design for WLRB7 and Waterway 6B (Alluvium, 2025)**

Based on our review of the current functional design proposed by Alluvium we generally agree with design parameters adopted. However, we have proposed an alternate location for “WLRB 7” as we believe that there is a significant opportunity to utilise constrained land in the PSP and recover land more suitable for Net Developable Area (NDA).

Our design inputs, assumptions and proposed amendments have been provided herein:

### Input data:

Our design has been based on the following key input data.

- Property boundaries based on cadastral survey sourced from VICMap
- Topography elevation data based on LiDAR to +/-50 mm accuracy sourced from DEECA

### Design parameters:

The table below compares the DPM and Alluvium design parameters:

**Table 1 – Spatial design parameters**

Design Parameter	Alluvium	DPM
Sediment Surface Area	3,500 m <sup>2</sup>	3,500 m <sup>2</sup>
Sediment Drying Area	1,600 m <sup>2</sup>	2,600 m <sup>2</sup>
Macrophyte Zone	16,000 m <sup>2</sup>	16,000 m <sup>2</sup>

**Table 2 -Level/elevation design parameters**

Design Parameter	Alluvium	DPM
Batter Slopes	1 (V): 6(H)	1 (V): 6(H)
Normal Water Level (NWL)	103.8 m AHD	103.8 m AHD
RB Peak flood level	104.54 m AHD	104.70 m AHD
Peak RB storage	17,700 m <sup>3</sup>	>17,700 m <sup>3</sup>



As shown in the tables above, the DPM design is largely consistent with the Alluvium design parameters. The surplus in sediment drying area offers greater flexibility to account for any unforeseen requirements that may arise during the detailed design acceptance process and final subdivision layout.

### Proposed Changes:

The efficiency of the DPM design lies in enabling the wetland to be relocated to a narrower and more constrained parcel of land within the PSP. It is submitted that wetland “WLRB 7” is relocated further north-east and bounded by Taylors Road, Paynes Road and the “K4” SHW. This avoids encroachment into land better suited for urban development. It also relocates “WLRB 7” in a lower laying area which previously relied on being serviced by the next-most downstream wetland referred to as “WLRB 9”. It also extends the wetland’s contributing catchment boundary to a more definitive and logical location at the Paynes Road waterway crossing.

A concept layout of DPM’s design has been provided in Figure 3 further below.

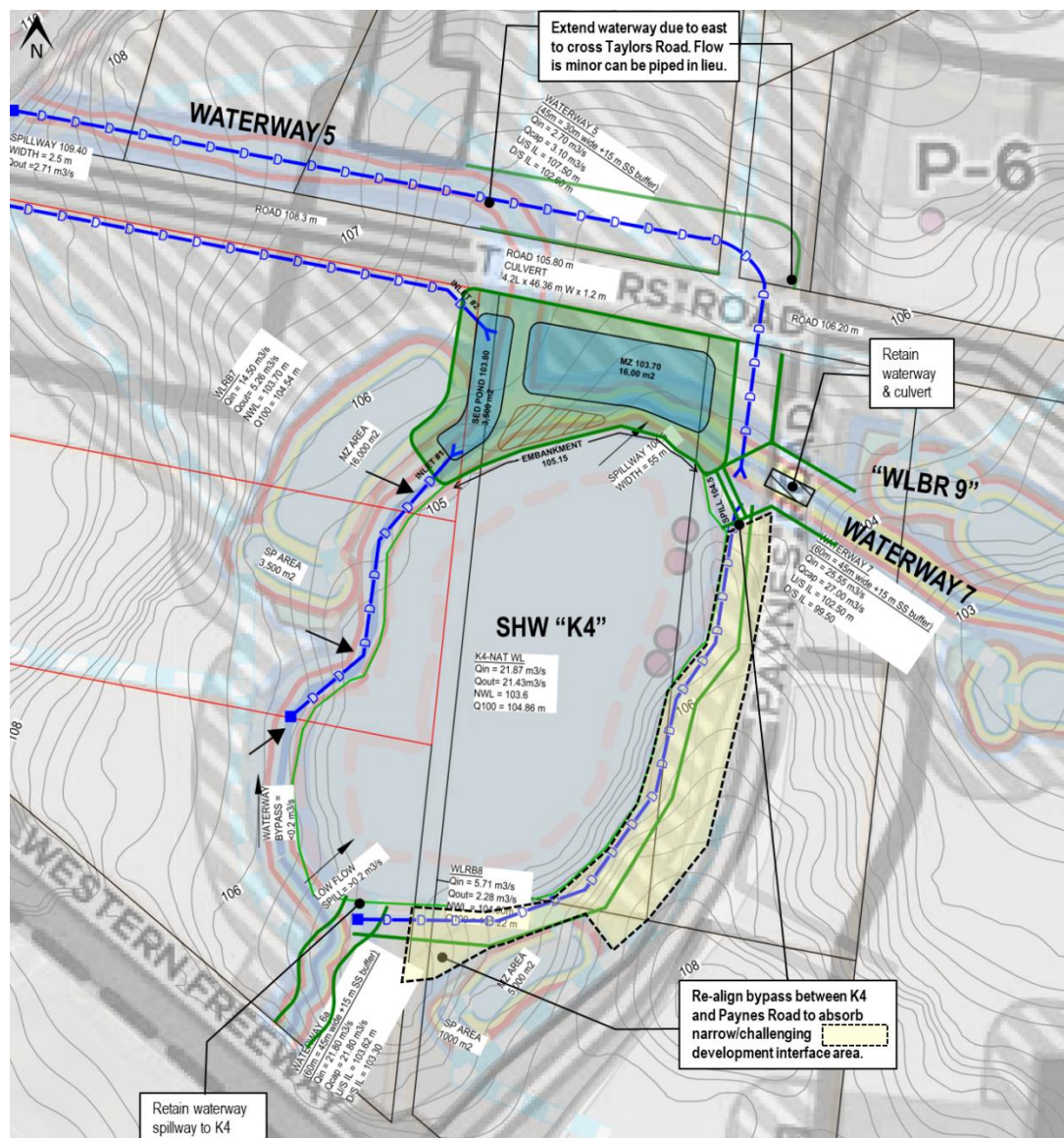


Figure 3 - Proposed DPM Concept Design for “WLRB 7”



Other key changes include:

- Taking advantage of the constrained corridor of land located between the eastern boundary of the “K4” Seasonal Herbaceous Wetland (SHW) and the Paynes Road realignment by locating the proposed bypass channel (Waterway 6b) within this corridor.
- Extension of the proposed waterway located to the north and parallel to Taylors Road to allow connection into the proposed waterway/culverts at Paynes Road based on the newly proposed location of “WLRB 7”.
- Re-alignment of the Drainage Scheme property drains along the western boundary of the K4 SHW to convey the incoming western catchment into “WLRB 7”.
- Two inlets for the sediment pond of “WLRB 7”.

### Further opportunities to increase NDA

Moreover, it is noted that there are further opportunities to provide savings in Net Developable Area (NDA) by piping both the waterway to the north of Taylors Road (“Waterway 5”) and the bypass Waterway “6B”. These are outlined herein.

### Waterway “6B”

The current Alluvium design proposes a bypass waterway with a capacity of  $0.74 \text{ m}^3/\text{s}$  with a design flow of  $\geq 0.2 \text{ m}^3/\text{s}$  to replicate the wetting regime of SHW “K4”. A cross-section taken approximately half-way through the waterway alignment based on the existing surface and the proposed invert levels in Alluvium’s functional design is provided in Figure 4 below.

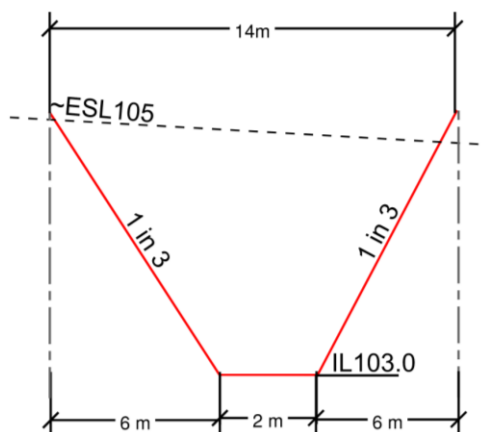


Figure 4: Cross-section taken halfway along “Waterway 6B”

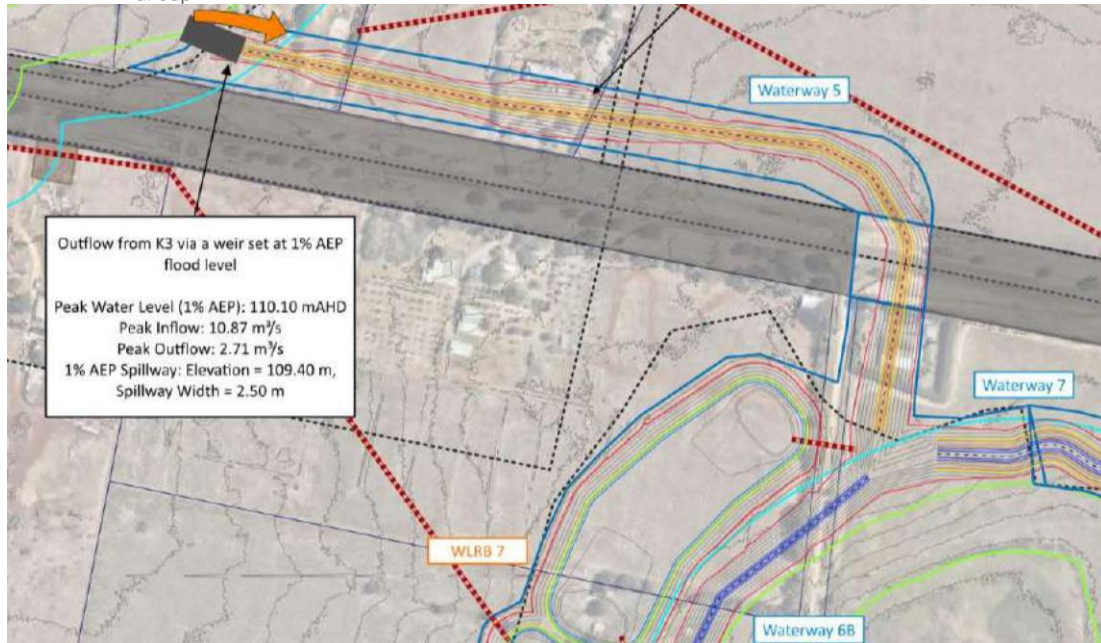
The waterway commands a top width in the order of 14 metres.

Table 39 of the Alluvium functional design report provides a top width of 7.0 m - this does not reflect the depth that will be required to drain the diverted flows from the upstream main waterway (“Waterway 6a”) as shown in the section above.

Given the relatively low magnitude of flow and the disproportionate land take, DPM proposes that Waterway “6B” is piped along the “K4” SHW boundary. This approach conserves developable land while achieving the intended hydraulic function.

### “Waterway 5”

Waterway 5 conveys the outflow from SHW “K3” which is in the order of  $2.7 \text{ m}^3/\text{s}$  as shown in Figure 5.



**Figure 5 - Waterway 5 (Alluvium, 2025)**

A flow of this magnitude can be contained in a 1200 mm diameter drain running at an average grade of 1 in 150, which is achievable based on the natural topography and the proposed upstream and downstream invert of this waterway.

If this change were to be adopted, it would liberate an additional 2.3 hectares of NDA in an area designated for increased density.

#### **Strategic Value of Proposed changes:**

The proposed relocation of “WLRB 7”, re-alignment of bypass Waterway “6B” and proposal to pipe waterways carrying flows small in magnitude represents a material gain in NDA within the PSP.

Given the limited availability of Developable land in the Melton East PSP, this efficiency unlocks land that supports precinct targets for housing yield and walkable neighbourhoods, particularly given the subject land’s proximity to the Neighbourhood Activity Centre on the north side of Taylors Road.

We welcome further discussions with VPA, Melbourne Water, and relevant stakeholders to consider our refinements as part of the PSP’s finalisation and subsequent DSS implementation.

Please do not hesitate to contact us on the undersigned should you require further detail.



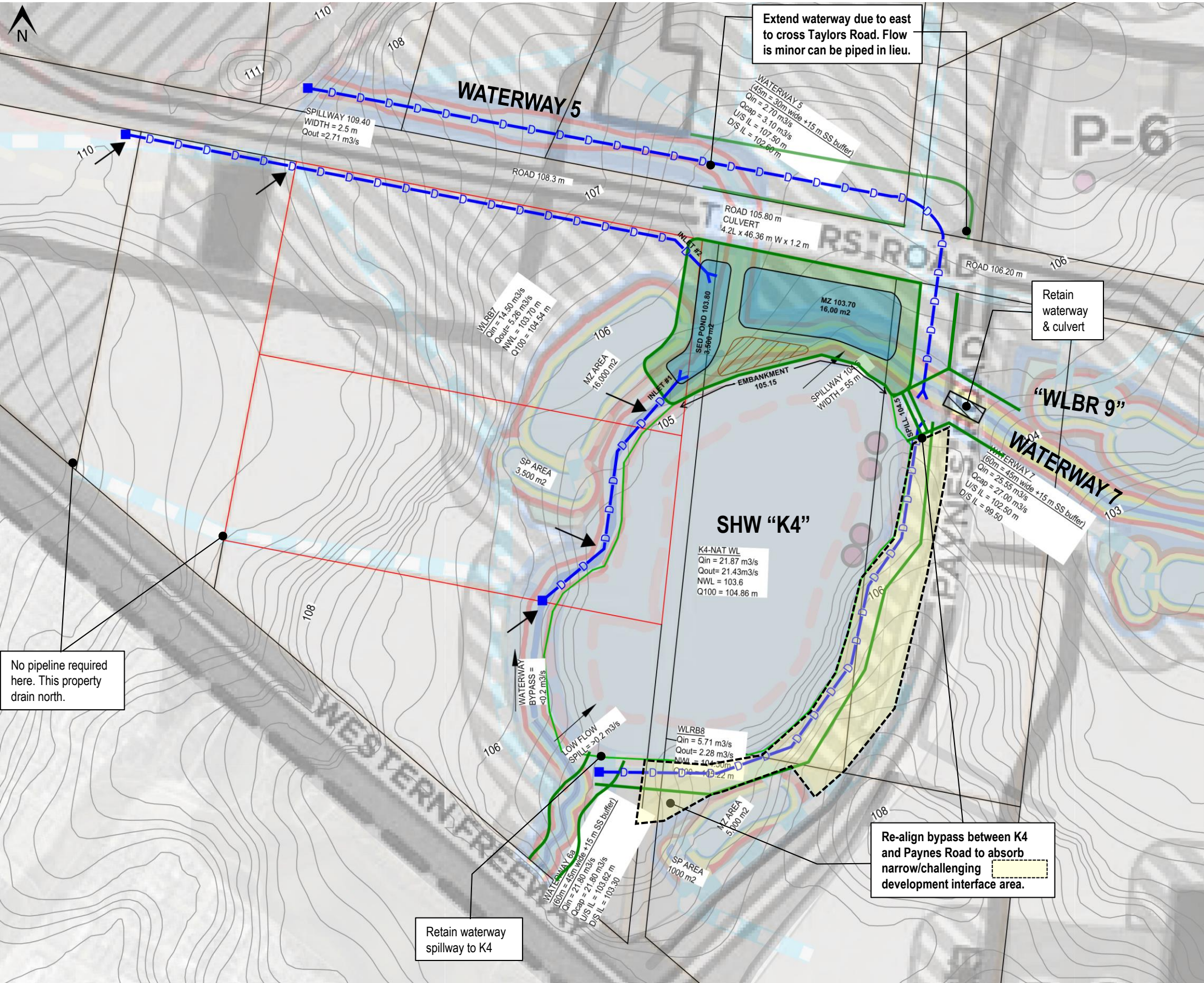
BCivEng (Hons)

**DPM Consulting Group**

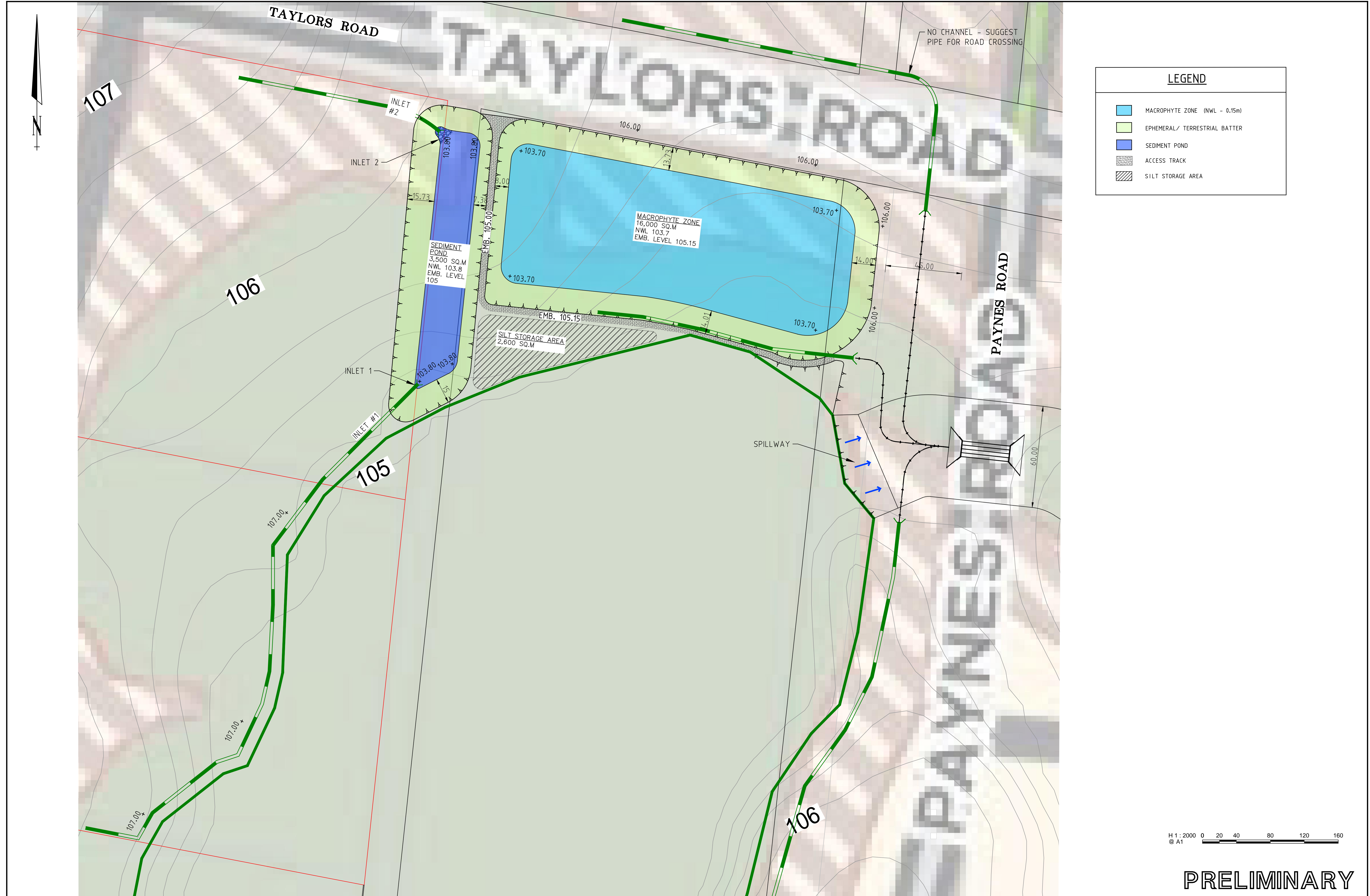
22 Business Park Drive, Notting Hill Victoria 3168

Australia









LEGEND

MACROPHYTE ZONE (NWL - 0.15m)

EPHEMERAL/ TERRESTRIAL BATTER

SEDIMENT POND

ACCESS TRACK

SILT STORAGE AREA

H 1:2000 0 20 40 80 120 160  
@ A1

PRELIMINARY

				LEGEND										22 Business Park Drive Notting Hill VIC 3168 A.C.N. 006 550 803 E: consulting@dpmvic.com.au W: www.dpmvic.com.au T: (03) 9538 5000														DRAWN: J.PETTIFER DESIGNED: L.PAPAZOIS CHECKED: J.MATHIOS AUTHORISED: ---- PE REG NO: ---- DATE: ----				AUTHORITY: ---- PROJECT: <b>MELTON EAST PSP</b> <b>2-64 PAYNES ROAD - GRANGEFIELDS</b> DETAILS: <b>WETLAND CONCEPT - WLRB7</b>				SCALE 1:2000 LEVEL DATUM AHD SHEET 1 OF 1 DRAWING No. <b>3261/WL7/W02</b> REV. P1			
				<div><div><div></div><div>GAS MAIN</div></div><div><div></div><div>WATER MAIN</div></div><div><div></div><div>RECYCLED WATER MAIN</div></div><div><div></div><div>ELECTRICITY CABLE</div></div><div><div></div><div>TELECOMMUNICATIONS CABLE</div></div><div><div></div><div>WATER CONDUIT</div></div><div><div></div><div>GAS CONDUIT</div></div><div><div></div><div>RECYCLED WATER CONDUIT</div></div><div><div></div><div>COMBINED SERVICES CONDUIT</div></div><div><div></div><div>T.B.M.</div></div><div><div></div><div>P.S.M.</div></div></div> <div><div><div></div><div>HOUSE DRAIN PROPOSED/EX.</div></div><div><div></div><div>PROPERTY INLET, DRAINAGE PITS</div></div><div><div></div><div>EX./FUT. INLET, DRAINAGE PITS</div></div><div><div></div><div>DRAINAGE PIT STAGE/NUMBER</div></div><div><div></div><div>SEWER LINE AND STRUCTURES</div></div><div><div></div><div>EX-SEWER LINE AND STRUCTURES</div></div><div><div></div><div>KERB AND CHANNEL</div></div><div><div></div><div>EX./FUT. KERB AND CHANNEL</div></div><div><div></div><div>KERB TO BE REMOVED OFFSITE</div></div><div><div></div><div>STREET SIGN</div></div></div> <div><div><div></div><div>CHAINAGES AND TANGENT POINTS</div></div><div><div></div><div>EXISTING SURFACE LEVEL</div></div><div><div></div><div>FINISHED LEVEL (TITLE BOUNDARY)</div></div><div><div></div><div>DESIGN TOP/TOE OF BATTER LEVEL</div></div><div><div></div><div>DESIGN PAVEMENT LEVEL</div></div><div><div></div><div>PROPOSED CONTOUR LINE &amp; LEVEL</div></div><div><div></div><div>EXISTING CONTOUR LINE &amp; LEVEL</div></div><div><div></div><div>FILLING IN EXCESS OF 200mm</div></div><div><div></div><div>CATCH DRAIN AND INVERT LEVEL</div></div><div><div></div><div>EX. BATTER</div></div><div><div></div><div>PROP. BATTER</div></div></div>																																			