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 Victorian Planning Authority
 Wurundjeri Country
 via: Engage Victoria submission page

28 March 2025

Dear Genna

Planning Scheme Amendment C244melt
 Melton East Precinct Structure Plan

Tract acts on behalf of our client Mt Cottrell Land Pty Ltd (Growland) in relation this matter.

Our client provides this submission to Melton Planning Scheme Amendment C244melt (the Amendment) which seeks to, amongst other matters, rezone land for residential purposes and incorporate the draft *Melton East Precinct Structure Plan* (the PSP) and draft *Melton East Infrastructure Contributions Plan* (the ICP) into the *Melton Planning Scheme*.

Growland commends the Victorian Planning Authority (VPA) on the extensive work undertaken to date in planning for the Melton East precinct. Growland is generally supportive of the implementation of structure planning principles via the proposed PSP, ICP and the application of relevant zones and overlays.

Notwithstanding this, as detailed in this submission, Growland considers that there are specific matters that require review and reconsideration prior to adoption of the Amendment.

Landholdings within Melton East

As shown in Figure 1, Growland has two landholdings within the western extent of the PSP area, being:

- 592-610 Mount Cottrell Road Melton (12 hectares)
- 2 High Street Melton (33.93 hectares)

Both properties have existing road access and consist of vacant agricultural land.

The western boundary of 2 High Street adjoins the PSP boundary and abuts an existing and extensive industrial precinct. Land immediately adjacent this site, at 24 High Street, Melton is currently undergoing development for warehouses as part of the West Pines Industrial Estate.

Initial investigations undertaken by Arcadis in relation to servicing of the Growland landholdings confirm that delivery of 2 High Street will bring several important service extensions from the west, assisting to unlock development for neighbouring sites directly to the east. This is discussed further in this submission.

Submission summary

Growland submits that the following specific matters require review and reconsideration prior to adoption of the Amendment:

- Density: Whilst commendable, the density targets are undermined by poor implementation measures throughout the PSP.
- Open Space: There is opportunity to better locate and reduce in size the proposed 10-hectare active open space which is currently nominated on land at 2 High Street Melton.
- Voluntary Cultural Heritage Management Plan: It is inappropriate for the PSP to require or contemplate any voluntary CHMP process be undertaken for properties containing 'potential' stony rises. These matters are governed by a separate legislative Act and inclusion of same in the PSP is unnecessary, creates confusion and involves Council in consideration of such matters.
- North-South Road alignment: The alignment of the north-south road adjoining Growland's properties should be amended.
- Affordable Housing: The PSP should not seek to specify 'point-in-time' affordable housing requirements. Rather, it should integrate affordable housing requirements with application requirements, so these matters are dealt with as part of the planning permit stage.
- Development Staging: The PSP Staging is not useful nor necessary given the context for development and infrastructure across the precinct.

Issue 1: Density

Whilst commendable, the density targets are undermined by poor implementation measures contained in the PSP.

Central to precinct structure planning and consistent with the *PSP Guidelines: New Communities in Victoria, October 2021* (the PSP 2.0 Guidelines) is the delivery of 'viable density' in residential housing. This is primarily to be achieved via an 'amenity-based density model' following the principles of the 20-minute neighbourhood framework.

At Target 1 the PSP 2.0 Guidelines state:

- *The PSP should facilitate increased densities with an average of 30 dwellings or more per hectare NDA within:*
 - *400m walkable catchment of an activity centre or train station.*
 - *50m of open space, boulevards and major public transport routes including the PPTN.*
- *The PSP should facilitate increased densities with an average of 20 dwellings or more per hectare NDA across the entire PSP area.*

The PSP 2.0 Guidelines state that nuance in the Housing Plan can be provided to achieve "higher and lower densities where a site-specific deviation is required".

Application to 2 High Street Melton

The exhibited PSP identifies a large area within 2 High Street Melton for active open space and applies a 50-metre 'amenity area (standard)' designation around the reserve where a minimum density of 30 dwellings per hectare is required in accordance with Table 3 and Plan 3. Assuming an access road encircles the reserve, the amenity area (standard) zone can accommodate a single lot depth of higher density dwellings (likely townhouses).

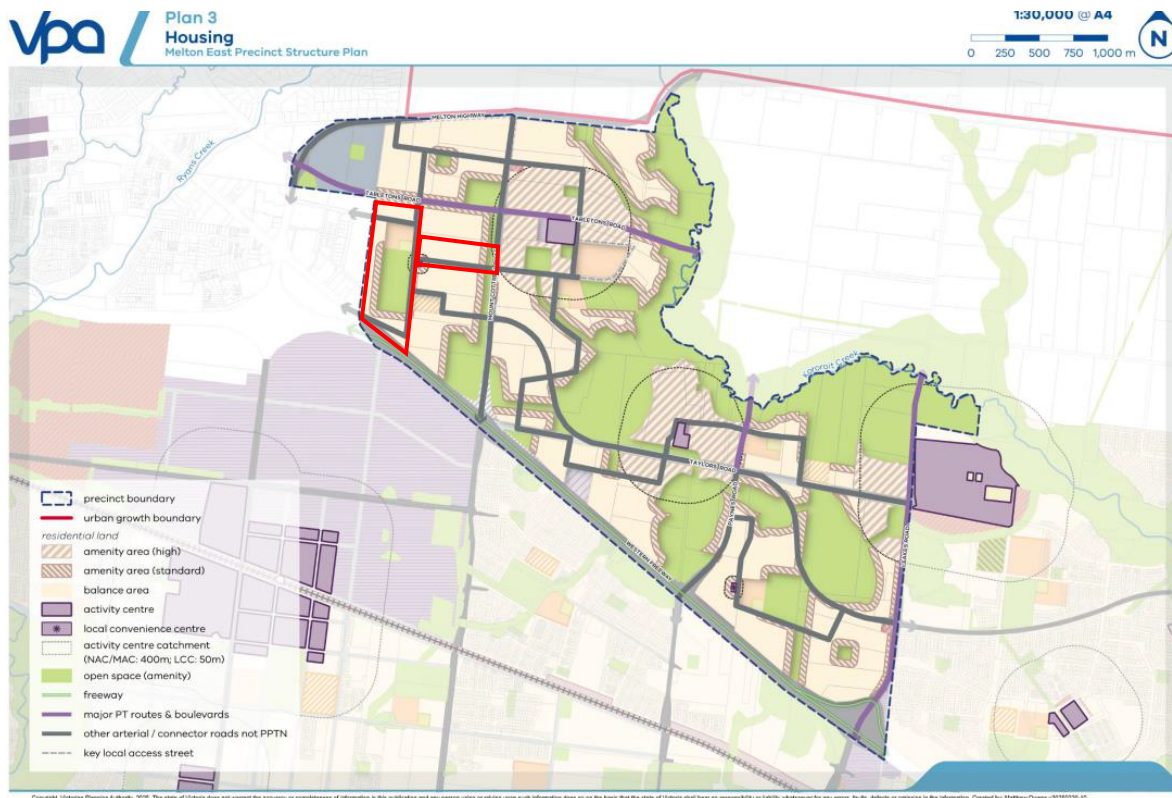


Figure 1 - Extract from the exhibited Melton East PSP (Plan 3 - Housing) with Growland properties highlighted

Conflicting implementation

Several other requirements and guidelines within the exhibited PSP conflict with the ability to deliver higher density, particularly within the 50-metre standard amenity area.

These include:

- **Requirement 4:** 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 sharing, servicing infrastructure and on-street car parking to the satisfaction of the responsible authority.
- **Guideline 1:** Residential subdivisions within amenity areas should demonstrate how a minimum of three housing typologies can be achieved. Where a residential subdivision is of a scale unsuitable to support three housing typologies, the subdivision may rely on other typologies within the area if the proposed development will contribute to housing diversity in the vicinity.
- **Guideline 12:** Laneway design and layout should:
 - Provide a laneway length between 50 metres to 80 metres.
 - Service a maximum of 8 to 10 dwellings per side.
 - Provide good passive surveillance into, along and through the laneway.
 - 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.

Requirement 4 (Rear Loading)

Whilst we understand the objective of this requirement is to reduce driveway crossovers and promote street tree planting, the way in which this requirement is worded restricts density overall by requiring a greater proportion of road network. This reduces the land available for housing.

The requirement is also superfluous having regard to separate requirements R22 and R23 which set a 30 per cent canopy tree coverage requirement within the public realm and require that street trees be planted on both sides of all streets at regular intervals.

To achieve the minimum density of 30 dwellings per hectare NDA within the 'amenity area (standard)' precincts, a range of lot widths including 4.5-metres, 6-metres, 8.5-metres and 9.2-metres will generally be utilised, with a larger proportion of narrower lot widths. Restricting these to rear-loaded only will have unintended consequences, increasing hardscape, increasing Urban Heat Island Effect, and reducing developable area.

Further, to achieve 'balance' density of 20 dwellings per hectare NDA, lot widths of 8.5-metres, 10.5-metres and 11.5-metres will often be mixed within a row. If Requirement 4 were to be maintained within the PSP, these rows would potentially need to be rear-loaded, increasing road network unnecessarily, and decreasing overall density.

We also note the VPA's PSP 2.0 Guidelines include example typologies for Small Lot Housing Code (SLHC) Type B1 and B2 dwellings at widths of 8.5-metres and 8-metres respectively, both front loaded.

For the reasons above, we seek that Requirement 4 be deleted.

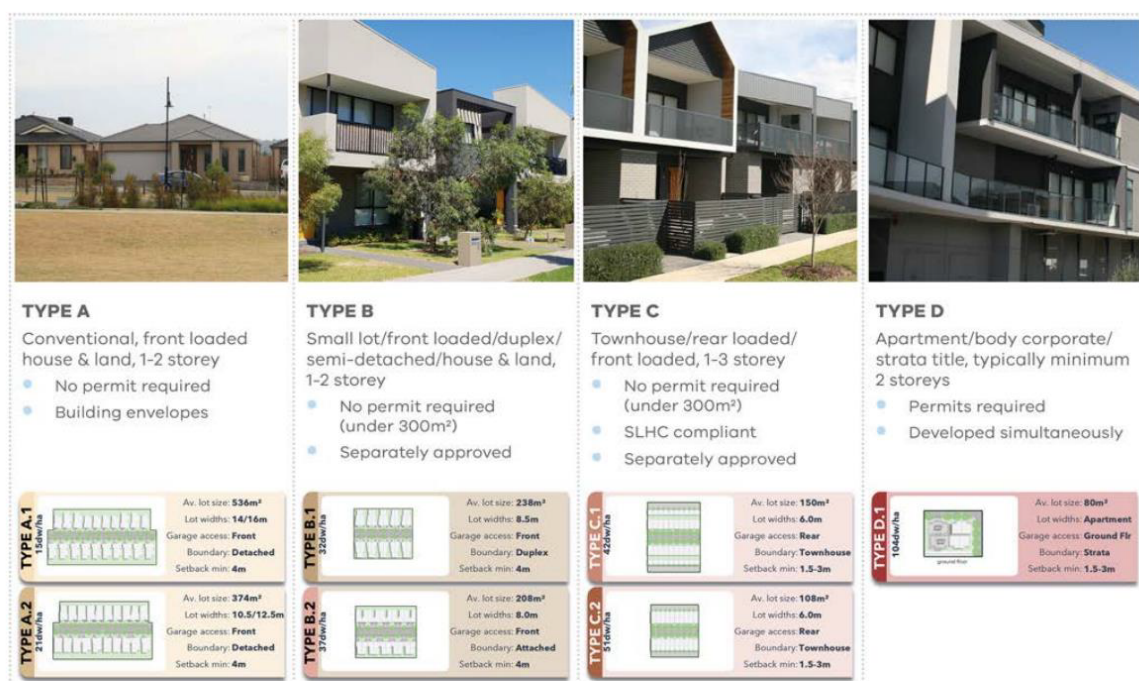


Figure 20. Housing typologies to support higher density development in high amenity areas
(Source: images from L to R, Type A, C & D – MESH Planning, Type B – VPA)

Figure 2 - Extract from PSP 2.0 Guidelines (VPA 2021)

Guideline 1 (Housing Typologies)

This Guideline fails to recognise that the application of 'amenity areas (standard)' as a 50-metre linear area means it is likely that only attached townhouse-style typologies are achievable at a single lot depth. Due to the spatial arrangement of these areas, it is not possible to rely on other typologies within the same 'amenity area'.

This guideline is likely to be workable only within the 'amenity area (high)' precinct of the PSP which has a more flexible 400-metre (depth) dimension.

The requirement for a mix of housing typologies within the 'amenity area (standard)' should be deleted.

Guideline 12 (Laneway Design)

Guideline 12 also impacts the ability to achieve higher densities by imposing a requirement for a side street for every 8-10 dwellings (or 50-80 metres). When coupled with Requirement 4, the effect on density of these items together is significant.

As a standalone guideline, Growland submits that the wording should be outcome-based and more directly focussed on the safety and visual surveillance of laneways, rather than specifying a precise length or the number of dwellings they can serve.

Submission

For the reasons above, we submit that Requirement 4, Guideline 1 and Guideline 12 be either deleted or significantly revised.

Issue 2a: Active open space – distribution

The exhibited PSP proposes several active open space reserves including 2 x 8-hectare reserves, 1 x 10-hectare reserve, and a State Metropolitan Park of 15-hectares as shown within Figure 3 below.

- SR-01: 10-hectares
- SR-02: 8-hectares
- SR03 A & B: 15-hectares
- SR-04: 8 hectares



Figure 3 – Extract from the PSP (Plan 6 - Public Realm) with Growland properties highlighted

The arrangement of reserves has changed through the development of the draft PSP. Prior to the agency validation process, an 8-hectare reserve was nominated in the precinct west of Mt Cottrell Road and south of Tarletons Road, and a 10-hectare reserve was nominated adjacent the government primary school, high school and conservation area in precinct east of Mt Cottrell Road and south of Tarletons Road. This arrangement made logical sense as the larger local sports reserve was situated adjacent to the proposed government high school, the government primary school, the activity centre, and the residential precinct designated as 'amenity area (high)' at a minimum density of 40-dwellings per hectare NDA.

Contrary to this, the exhibited PSP shows the larger sports reserve relocated west of Mt Cottrell Road, with the smaller 8-hectare reserve in the east. The eastern reserve, SR-02 is situated as it had been previously shown, however has been reduced in size at the eastern interface as shown in the comparison images at Figure 4.



Figure 4 - Left: Draft Place Based Plan showing SR-02 as a 10-hectare reserve; Right: exhibited Place Based Plan showing SR-02 as an 8-hectare reserve (VPA, 2023/2025)

It is submitted that SR-02 ought to be returned to a 10-hectare reserve for the following reasons:

- The eastern reserve is better located within the 800-metre walkable catchment and therefore will be servicing a greater number of permanent residents.
- A larger reserve is preferable from a facilities point of view, given it will likely be utilised by students of the adjacent P-6 and 7-12 Government schools, thereby servicing more people who live outside the immediate 800-metre catchment area.
- Extension of the reserves' eastern extent to meet the drainage corridor (as shown in the left-hand image of the Figure above) will reduce awkward wedge-shaped parcels. This facilitates more efficient provision of 'amenity area (standard)' housing along the reserve perimeter (minimum 30 dwelling per hectare NDA). This in turn will again increase the number of people living within 800-metres of the reserve. Refer Figure 5 below.
- Co-location of open space with conservation reserves is preferable from an amenity perspective.
- Co-location of open space with waterway reserves enhances the role that encumbered open space can play in the open space network.
- Co-location of SR-02 through better connectivity with the Kororoit Creek conservation area will create synergies with walking and cycling tracks, providing safe and convenient active transport routes to the schools and activity centre from land to the south.

In addition to the above, the PSP 2.0 Guidelines encourage an outcome of synergy between active and encumbered open space networks (see General Principles F10.02 – F10.05 inclusive) and further supports the above approach.

Submission

SR-02 should be extended to the drainage reserve to the east to again form a 10-hectare open space reserve. As a consequence of returning SR-02 to a 10-hectare reserve, SR-01 would revert to an 8-hectare reserve.

Issue 2b: Active open space – SR-01 location

Growland submits that the proposed SR-01 can be better located.

To achieve PSP Target 12, 100 per cent of dwellings must be located within 800m of a sports reserve or open space; and 90 per cent of dwellings must be located within 400m of a local park. To achieve this, the PSP should create an even distribution of open space reserves across the PSP area. It requires one reserve located in the area bound by Mt Cottrell Road to the east, Tarletons Road to the north, and the PSP boundary to the south and west. Refer red boundary in Figure 5 below.

The exhibited PSP falls short of Target 12. It achieves:

- 85 per cent of residential land within 800m of a sports reserve (target is 100); and
- 82 per cent of residential land within 400m of a local park (target is 90).

Figure 5 shows that a proportion of the PSP area surrounding the Mt Cottrell Road / Taylors Road intersection does not appear to be within a walkable distance to open space. This is in part due to the proposed SR-01 being situated too far west, resulting in much of its walkable catchment overlapping with the industrial area adjacent the PSP to the west.

In examining possible locations for SR-01, we note its location is influenced by several factors, including:

- A desire for the reserve to directly adjoin the Government primary school and community facility (i.e. no road dividing the land uses).
- A preferred north-south oval alignment requiring minimum dimensions of 390-metres by 205-metres (8-hectare reserve size).
- A requirement for adjacency to a Connector Road, particularly preferred two road frontages for any Government school.



Figure 5 - Extract from PSP (Plan 6 - Public Realm) annotated to show existing road reserves

In exhibiting the PSP, it appears the VPA has altered its approach to include connections with Navigation Drive, and the straightening of Tarletons Road. The effect is that these changes appear to have been 'bolted on' to the previously proposed road network in this sub-precinct without examining whether the previously shown internal roads could be better located.

Growland submits that there is a more efficient Connector Road layout available than that currently shown within the precinct identified in Figure 5, particularly around the non-government school.

In reconsidering the location of several key Connector level roads, the VPA could achieve a more appropriate location for SR-01 and the accompanying facilities, by locating SR-01 and the accompanying government primary school and community facility south-east.

SR-01 can be better located on the basis that:

- The reserve is an ICP item 100 per cent attributed to this Precinct Structure Plan, yet the 400-metre catchment does not appear to service the PSP to the maximum extent possible.
- The western boundary of SR-01 is bound by developable area which has been nominated as a 50-metre amenity-based density area. The resulting higher density dwellings would be poorly located near industrial development west of 2 High Street and isolated from the proposed local convenience centre.
- The width of developable land between the western PSP boundary and the edge of SR-01 as exhibited results in an inefficient use of land of generally low amenity.

Submission

An improved location for SR-01 could be achieved if considered alongside a review of the connector road network within the immediate vicinity west of Mt Cottrell Road. More specifically, SR-01 would be better located south-east of the current location.

In the event that SR-01 remain at 2 High Street, we submit that it should be reduced in size (per item 2A above) and located adjacent the westernmost PSP boundary.

Issue 3: Voluntary Cultural Heritage Management Plan

Guideline 33 of the exhibited PSP states that a voluntary Cultural Heritage Management Plan (CHMP) should be undertaken on land identified as a 'potential rise area' on Plan 10 – Aboriginal Cultural Heritage Values if a high impact activity is proposed.

According to Plan 10, a 'potential rise area' is located in the southern portion of 2 High Street Melton. We note that according to the Aboriginal Cultural Heritage Impact Assessment prepared by Unearthed Heritage in February 2025, the land was not inspected.

Submission

Growland submits that cultural heritage matters are appropriately and adequately protected via the *Aboriginal Heritage Act 2006* and *Aboriginal Cultural Heritage Regulations 2018*. Neither legislation mandates preparation of a voluntary CHMP and the inclusion of this in the PSP creates confusion and is inconsistent with a landowner's legislative obligations. The requirement for a voluntary CHMP should be removed from the PSP.

Issue 4: Alignment of north-south connector

The north-south Connector Road west of Mt Cottrell Road and south of Tarletons Road has been exhibited to include a small 'kink' which has the effect of sterilising a portion of land to its east, from future development.

Submission



Figure 6 - Extract from Place-based Plan showing small kink in Connector Road (VPA, 2025)

Growland submits the kink in the alignment of the north-south connector road should be removed so that it continues in a straight alignment.

Issue 5: Affordable Housing

The exhibited PSP imposes a 12 per cent affordable housing requirement for land across the PSP area via Objective 5 and Guideline 3.

This is supported by Guideline 4 which states “Affordable housing products should be located in high amenity areas close to services and community facilities and provide for a range of housing typologies...”

Table 4 – Affordable housing delivery guidance breaks down the 12 per cent requirement specifying:

- 2 per cent of affordable housing to be provided as *subsidised market housing*.
- 9 per cent of affordable housing to be provided as *social housing*.
- 100 per cent of subsidised market housing to be provided for moderate income households.
- 69 per cent of social housing to be provided for very low income households.
- 28 per cent of social housing to be provided for low income households.
- 3 per cent of social housing to be provided for moderate income households.
- The percentages for 1, 2, 3 and 4+ bedroom homes to be provided as *subsidised market housing* and *social housing*.

Submission

To avoid confusion with the term ‘amenity area (high density)’ Growland submits that the wording for Guideline 4 be revised to state “Affordable housing products should be located *in areas with close proximity to* services and community facilities...”

Further, Growland submits that Objective 5 (“To facilitate 12% affordable housing”) is in fact an outcome and not an objective. The Objective should be combined with similar Objectives 2 and 4, consistent with the approach adopted in the Officer South PSP, similar to the below:

“To provide diversity of housing types and choice (lot size and physical form of housing) to meet community needs, including increased densities, accessible and specialised housing, and affordable and social housing options.” (Officer South Employment PSP Objective 24)

We submit the detail contained within Table 4 is excessive, having regard to the long-term nature of the structure plan and the likelihood of community need changing over time. We otherwise do not consider that the affordable housing aspiration is strategically justified.

Finally, we note that 2 per cent of subsidised market housing and 9 per cent of social housing does not equate to 12 per cent affordable housing and if retained, this should be corrected.

Issue 6: Staging

The exhibited PSP includes a Staging Plan which divides the precinct into three areas: two precincts (purple) to proceed first, and a large central precinct (blue) to proceed last (refer Figure 7).

A significant number of intersections, road network, bridges, culverts and State transport infrastructure are nominated within each stage. The Staging plan does not mention sewer, water, drainage, electricity or telecommunications infrastructure which are all necessary for the orderly development of land.

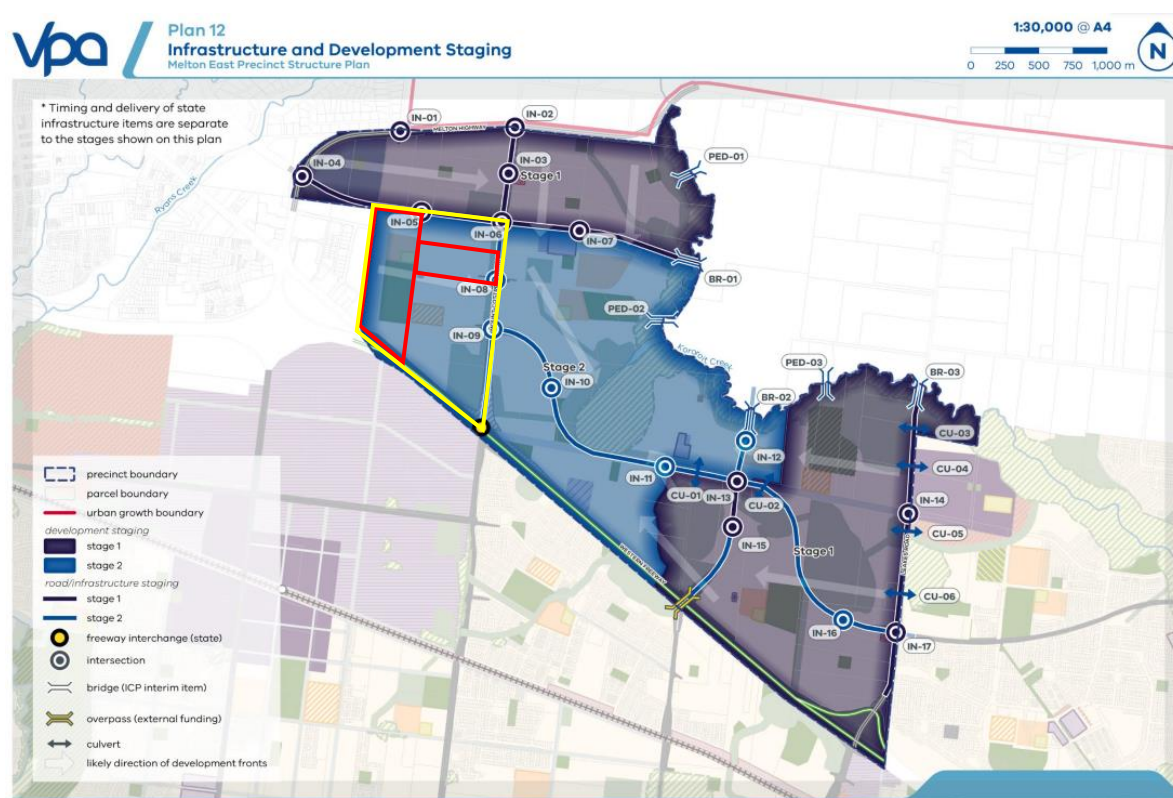


Figure 7 - Staging Plan (VPA, 2025) with Growland sites highlighted red, and the sub-precinct highlighted yellow.

The Staging Plan is accompanied by Requirement 62 which states:

"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."

Whilst we are yet to interrogate the modelling prepared by AECOM in detail, we question the need for a staging plan which:

- Appears to exclusively consider the impact of ICP-funded transport infrastructure in the sequential development of land.
- Holds back the development of pedestrian bridges even where development adjacent may have already occurred (for example PED-01 and PED-03).

- Identifies Tarletons Road within Stage 1 (north) but does not consider the opportunity for development south of this key arterial.
- Proposes the northern portion of Stage 1 proceed without the provision of a school, sports oval, community facility, or local convenience centre.

Growland commissioned Arcadis to complete an Engineering Services Report for 2 High Street, Melton which has found the land bound south-west of Tarletons Road and Mt Cottrell Road capable of being predominantly serviced (electricity, water, telecommunications) via High Street which adjoins the site in the south-west.

Furthermore, there is a logical location in the south-east of that precinct for a temporary sewer pump station capable of servicing the entire sub-precinct.

Drainage of the sub-precinct is subject to the final design of RB-05 (also known as WLRB 4) which is located across the High Street Melton DS and the Koroit Creek Upper DS. However, it is understood that this drainage asset would largely provide for the drainage needs of the sub-precinct, or otherwise temporary drainage infrastructure could be negotiated to release the land which would otherwise be needlessly withheld from development.

The sub-precinct's existing connections into the established Melton East industrial precinct via High Street and Navigation Drive, and the precinct's potential to deliver much needed community infrastructure (government primary school, community facility, local convenience centre, and active open space reserve) to Stage 1 residents, mean it is a logical choice for inclusion within Stage 1 of the PSP.

Submission

Growland's primary position is that there should be no staging within the PSP.

It is Growland's further submission that if the Staging Plan is to remain within the PSP, land within the identified sub-precinct should be included within Stage 1.

Summary

Please find below a summary of requested changes/ amendments to the PSP:

Item	Request
Requirement 4	Removal
Guideline 1	Amendment, so as not to apply to 'amenity area (standard)' areas
Guideline 12	Removed, or Amendment to delete the precise length of laneways or the number of dwellings they serve
Plan 6 / SR-01 / SR-02	Amendment, so SR-01 is 8-hectares in size and SR-02 is 10-hectares in size
Plan 6 / SR-01	Amendment, showing relocation of SR-01 south-west of the current location, or otherwise located adjacent westernmost PSP boundary
Guideline 33	Removal
Connector road	Amendment of the Connector road south of Tarleton's Rd and west of Mt Cottrell Rd to align with property boundaries
Guideline 4	Amendment, to replace reference to 'high amenity areas' with wording less confusing
Objective 5	Removal or Amendment to combine Objective 5 with Objectives 2 and 4
Table 4	Amendment, to reduce specificity and correction of mathematical error
Plan 12	Removal or Amendment to include the western precinct south of Tarletons Road within Stage 1

We trust that the above submissions will aid the Victorian Planning Authority in finalising the *Melton East Precinct Structure Plan* and *Melton East Infrastructure Contribution Plan* for incorporation within the Melton Planning Scheme. On behalf of our client, we note these submissions are without prejudice, and we reserve the right to expand upon this submission at any future point in time.

If you have any questions regarding the detail of this submission, please feel free to contact me as required.

Sincerely,



Tract