

Monday, 31 March 2025

Victorian Planning Authority

Via email: [Genna.Walkley@vpa.vic.gov.au](mailto:Genna.Walkley@vpa.vic.gov.au)

Dear Genna,

## DRAFT AMENDMENT C244 MELTON EAST PRECINCT STRUCTURE PLAN SUBMISSION

Veris acts on behalf of Maximise Group (Maximise), the owners of the land at 2231-2257 Melton Highway (the site) within the Melton East Precinct Structure Plan (PSP). The below sets out Maximise Group's formal submission to the release of draft Planning Scheme Amendment C244 that is intended to implement the Melton East PSP. The submission responds to key identified issues and constraints.

### Subject Site and Surrounds

The subject site is located in the north-west corner of the Melton East precinct and has been identified as future Employment Land (Parcel 03). Specifically, the site is classified as Light Industry and is envisaged for light industrial and commercial land uses to provide services and employment opportunities to the growing Melton community. Pursuant to draft Urban Growth Zone – Schedule 13 within the Melton Planning Scheme, the proposed applied zone is Industrial 3 Zone (IN3Z), which allows for lighter industry and associated uses compatible with the surrounding residential community.

Melton Highway borders the site along the western boundary and to the east the site abuts additional employment land (Parcel 04) that is similarly classified as Light Industry and contains a local park. The light industrial area is intended to leverage off the existing Melton Homemaker precinct which is located to the southwest of the subject site. *Plan 4 Movement Network* within the draft PSP demonstrates the alignment of the 6-lane arterial road through the site. Tarletons Road enables an east-west connection from the PSP area to the Melton Homemakers precinct and existing Melton Township. Furthermore, there is a 1.2ha drainage reserve (RB-01) proposed in the south-west corner of the site and there is no existing native vegetation.



Figure 1. Subject Site. Source: Victorian Planning Authority (VPA) (2025).

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## Submission Grounds

Of particular concern is the low Net Developable Area (NDA) available across the PSP and we submit that any efficiencies that allow additional land to be converted to developable is highly valuable. Our primary concerns and submission grounds are summarised below.

- Maximise strongly object the site's inclusion within the High Street Melton DSS. This would require the site to depend on future downstream assets to the east, creating unnecessary reliance on infrastructure that may not be available within the Stage 1 timeframe as per the PSP intent. Maximise is committed to develop as soon as the PSP is gazetted, and permits are approved and removing the land from the scheme releases this development by allowing to be independent of downstream scheme assets. We strongly submit that the site remains outside of the DSS as it can be self-managed with drainage and water quality treatment on site and then discharged to the south. The values given in the DSS demonstrate this. Additionally, the site is owned by a single landowner and located at the top of a catchment, further demonstrating its ability to operate independently of the PSP scheme.
- If the site remains out of the scheme (Maximise's preference), the RB will be removed from the PSP documentation and is therefore redundant. However, if the site is included within the scheme, Maximise does not support the location and size of drainage reserve RB-01. We object to the location of the RB due to its valuable orientation fronting the Melton Highway, the most economically feasible location for industrial and commercial viability. Instead, we request the PSP allow flexibility for an innovative underground stormwater detention system located beneath internal roads. Alternatively, we understand that there is opportunity to further refine the RB design to reduce its footprint, subject to a future technical design submission.
- Tarletons Road upgrade including IN-04 (signalised intersection) and RD-02-01 will be delivered in the interim as a 2-lane arterial road with a connection to the existing roundabout at Melton Highway. The Melton East ICP includes interim construction of both infrastructure projects however the ICP states that interim works are not considered eligible for works in kind credits. If the subject site is developed first, the interim roundabout connection would need to be delivered, likely as works in kind. We submit that works in kind credit should be permitted in this instance if required. We also require further clarity as to whether DTP will fund the ultimate construction of these infrastructure projects.
- The proposed cross-section for Tarletons Road between Melton Highway and Mount Cottrell Road has been designated as a six-lane corridor, yet the findings of the Integrated Transport Assessment prepared by AECOM (February 2025) suggest that a four-lane cross-section would suffice to meet the projected traffic demands. We submit that the VPA should undertake more detailed traffic modelling to ascertain whether a 4-lane cross-section is more appropriate. A reduced cross-section would provide benefit to multiple landowners.
- Greater Western Water advised that the site is planned to be serviced by connection to the existing sewer in Melton Highway. This outcome is supported by Maximise and we seek to ensure that this is ratified within the gazetted PSP.
- Current alignment of Tarletons Road severs the site and creates irregular land parcels that cannot be easily accessed by vehicles to the south. The current alignment has been reviewed by a traffic engineer and we propose an alternative alignment in compliance with relevant Austroads design guidelines. This realignment results in increased NDA for both our site and the site to the east which is considered a highly beneficial outcome for the overall precinct. Please refer to Appendix 1 Concept Plan package prepared by Studio Way for details of the proposed realignment.
- Maximise proposes the realignment of the property boundaries on Melton Highway. Once the intersection is signalised, there is no inherent need to retain the existing splays as visible services appear to be located outside of the existing tree line. It therefore should be possible

to realign the property boundaries parallel to Melton Highway, as close to the proposed future footpath as possible.

- Maximise does not support the location of local Park (LP-01) within the centre of the industrial and commercial area to the east of our site. We submit that it should be relocated further east to increase its accessibility to the greater residential community. Preferably the park should be located within the residential community itself, to maximise the catchment and ultimate usage.

Please find attached to this letter below:

- A table summarising our detailed submissions to the key issues identified above;
- Submissions with respect to specific requirements and guidelines set out in the PSP;
- Appendix 1: Tarletons Road Realignment Concept Plan Package prepared by Studio Way;
- Appendix 2: Sewer and Drainage Strategy prepared by DPM;

We look forward to resolving these matters with the VPA. We also reserve the right to raise further matters with the VPA as submissions are received by other parties or issues are raised within a Panel Hearing.

Kind regards,



**Randah Jordan**

Principal Consultant – Consulting & Advisory

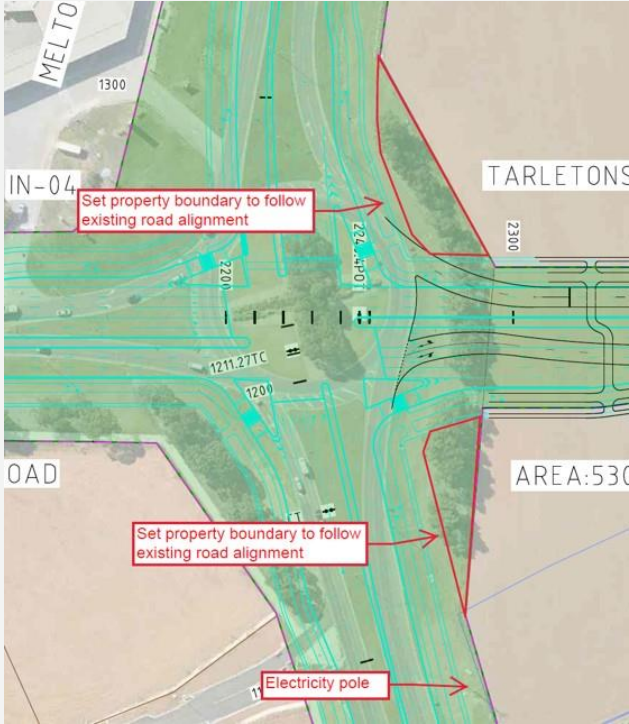
## Melton East Precinct Structure Plan –Submission General Issues

Issue	VPA Position	Maximise Submission
<b>Melton High Street Drainage Scheme</b>	The subject site was not included in earlier versions of the Melbourne Water DSS however the scheme boundary is proposed to be extended further west to include the subject site.	<ul style="list-style-type: none"> <li>The subject site was not included in earlier versions of the Melbourne Water DSS, and its inclusion in the latest boundary map appears to have occurred without consultation or transparent catchment-based rationale.</li> <li>Under the original PSP drainage strategy the site was to be serviced by a local drainage solution, involving on-site attenuation and discharge of pre-developed flows directly into the existing drainage infrastructure within Melton Highway. This approach was entirely consistent with both the site's natural topography and the PSP's staging framework.</li> <li>The recent inclusion within High Street Melton DSS would require the site to depend on future downstream assets to the east, undermining the ability to deliver early development and creating unnecessary reliance on infrastructure that may not be available within the Stage 1 timeframe as per the PSP intent.</li> <li>The proposed DSS arrangement would require stormwater to flow against the natural grade, toward the east. This change would result in a deepening of downstream drainage infrastructure, including wetlands and retarding basins within the DDS. The consequences of this are more complex and expensive construction due to increased excavation and structural requirements on scheme drainage assets, larger wetland footprints, deeper assets requiring larger reserve areas/ footprints further reducing NDA and diminishing industrial capacity, higher DDS infrastructure costs, which are passed on to developers through scheme contributions and unnecessarily increasing overall PSP development costs.</li> <li>Maximise's intent is to develop as soon as the PSP is gazetted and permits are approved and removing the land from the scheme releases this development by making it independent of downstream scheme assets.</li> <li>We strongly submit that the site may remain outside of the DSS as it can be self-managed. It is owned by a single landowner and will not be sold off prior to development, it is located at the top of a catchment, and drainage and water quality treatment can be managed on site and then discharged to the south. The values given in the DSS demonstrate this. Therefore the site is uniquely placed to be fully self-managed and removing the site from the scheme would eliminate reliance on downstream infrastructure, supporting timely, efficient delivery of industrial land in line with the PSP's staging intent.</li> </ul>

<b>Drainage (RB-01)</b>	<p>1.2ha drainage reserve (RB-01) located in the south-west corner of the site.</p>	<ul style="list-style-type: none"> <li>• <i>Plan 7 Water</i> within the draft PSP proposes a 1.2ha drainage reserve (RB-01) to be located in the south-west corner of the site.</li> <li>• As previously discussed, if the site remains outside of the DSS (Maximise preference), the RB will be removed from the PSP documentation and is therefore redundant. However, if the site is included within the scheme, Maximise does not support the location and size of drainage reserve RB-01 in the southwest corner of the site.</li> <li>• Melton Highway frontage holds the highest strategic and commercial value, and the current Wetland Retarding Basin (WLRB) layout directly reduces the site's development opportunities. The proposed size and placement of the WLRB significantly constrains land use flexibility and reduces the Net Developable Area (NDA) of the subject site.</li> <li>• RAIN has undertaken calculations that demonstrate there is opportunity to further refine the WLRB design to reduce its footprint and mitigate its impact subject to submission of a revised design as well as exploring the option for an underground detention system with tertiary treatment.</li> <li>• To preserve the most strategic and visible parts of the site, we request the PSP allows flexibility for an underground stormwater detention system, which could be located beneath internal roads and parking areas. While this would not provide treatment on its own, our client is committed to achieving Melbourne Water's Best Practice Environmental Management (BPEM) targets through the use /combination of various treatment options, including tertiary proprietary treatment products. This combined approach can deliver both flow attenuation and environmental compliance, in a way that protects industrial capacity and staging viability.</li> <li>• Due to the low NDA across the PSP area, we submit that any land that can be converted from drainage to developable industrial land is beneficial.</li> </ul>
<b>Works in Kind Interim IN-04 and RD-02-01</b>	<p>Standard levy rate proposed for commercial industrial land is \$147,562 per NDHa</p> <p>Supplementary levy rate is proposed \$342,933.55 per NDHa</p> <p>Total levy is \$490,495.55 per NDHa</p>	<ul style="list-style-type: none"> <li>• The relevant ICP projects to Parcel 03 are the signalised intersection (IN-04) and primary arterial road (RD-02-01) which refers to the segment of Tarletons Road between IN-04 and IN-05. Both are included within Stage 1 of infrastructure delivery.</li> <li>• Tarletons Road upgrade including IN-04 will be delivered in the interim as a 2-lane arterial road with a connection to the existing roundabout at Melton Highway and the Melton East ICP includes interim construction of both infrastructure projects.</li> <li>• Given the location of the site and assuming it will be developed before sites further east, the interim roundabout connection would need to be delivered, likely as works in kind by the developer.</li> <li>• The ICP states that interim works are not considered eligible for works in kind credits unless agreed by the collecting and development agencies. We believe this is more aligned to temporary access arrangements</li> </ul>

	ICP states that no works in kind credits can be sought for interim works, unless agreed by the collecting and development agencies.	<p>anyway however we require confirmation that works in kind credits may be sought by the developer for the interim roundabout connection.</p> <ul style="list-style-type: none"> <li>The ultimate construction of IN-04 and RD-02-01 is not included within Melton East ICP. We require confirmation that DTP will be responsible for funding the ultimate construction of these projects. Assuming DTP funding, Maximise's preference is to develop the final solution in one go to avoid duplication of works.</li> </ul>
<b>6-lane cross section for Tarletons Road</b>	Tarletons Road is nominated as primary 6-lane arterial between Melton Highway and Mount Cottrell Road.	<ul style="list-style-type: none"> <li>Another concern is the proposed six-lane cross-section for Tarletons Road, specifically between Melton Highway and Mount Cottrell Road. This section of the road has been designated as a six-lane corridor, yet the findings of the Integrated Transport Assessment prepared by AECOM (February 2025) suggest that a four-lane cross-section would suffice to meet the projected traffic demands. Section 7.1.4 of the ITA highlights that the strategic VITM modelling indicates no need for the additional capacity provided by a six-lane design. The justification that it may offer an advantage for reducing bus delays is unsubstantiated.</li> <li>The concerns arising from this potential over-design include unnecessary land acquisition, higher infrastructure costs, impacts pedestrian and cyclist safety (due to longer crossing distances and higher speeds) and more severe urban heat island effects.</li> <li>Another significant concern is that the current analysis relies exclusively on strategic-level modelling using the Victorian Integrated Transport Model (VITM). While VITM is useful for understanding macro-level traffic demand and broader network connectivity, it does not assess the operational capacity of individual intersections.</li> <li>Specifically, no micro-analytical modelling has been undertaken (e.g. using SIDRA) for the critical intersection at Melton Highway and Tarletons Road. This would inform whether a 6-lane cross-section is actually necessary, or whether it could be provided only on the approach and/or departure of the intersection, merging into a 4-lane cross-section east of Melton Highway. We are of the understanding that the VPA has used SIDRA in the past for examining intersections on other PSP projects, for example the East Werribee PSP.</li> <li>Given these concerns, it is recommended that the VPA undertake further detailed analysis before finalising the road network design for Tarletons Road. This includes SIDRA modelling to inform the actual lane requirements and whether a 4-lane cross-section could be adopted for all or part of Tarletons Road, east of Melton Highway.</li> <li>Incorporating detailed operational analysis will ensure that the road network design is proportionate to actual traffic needs, efficient in terms of cost and land use, and conducive to a safer and more walkable environment for future residents and others.</li> </ul>

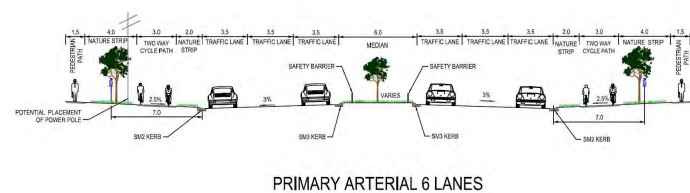
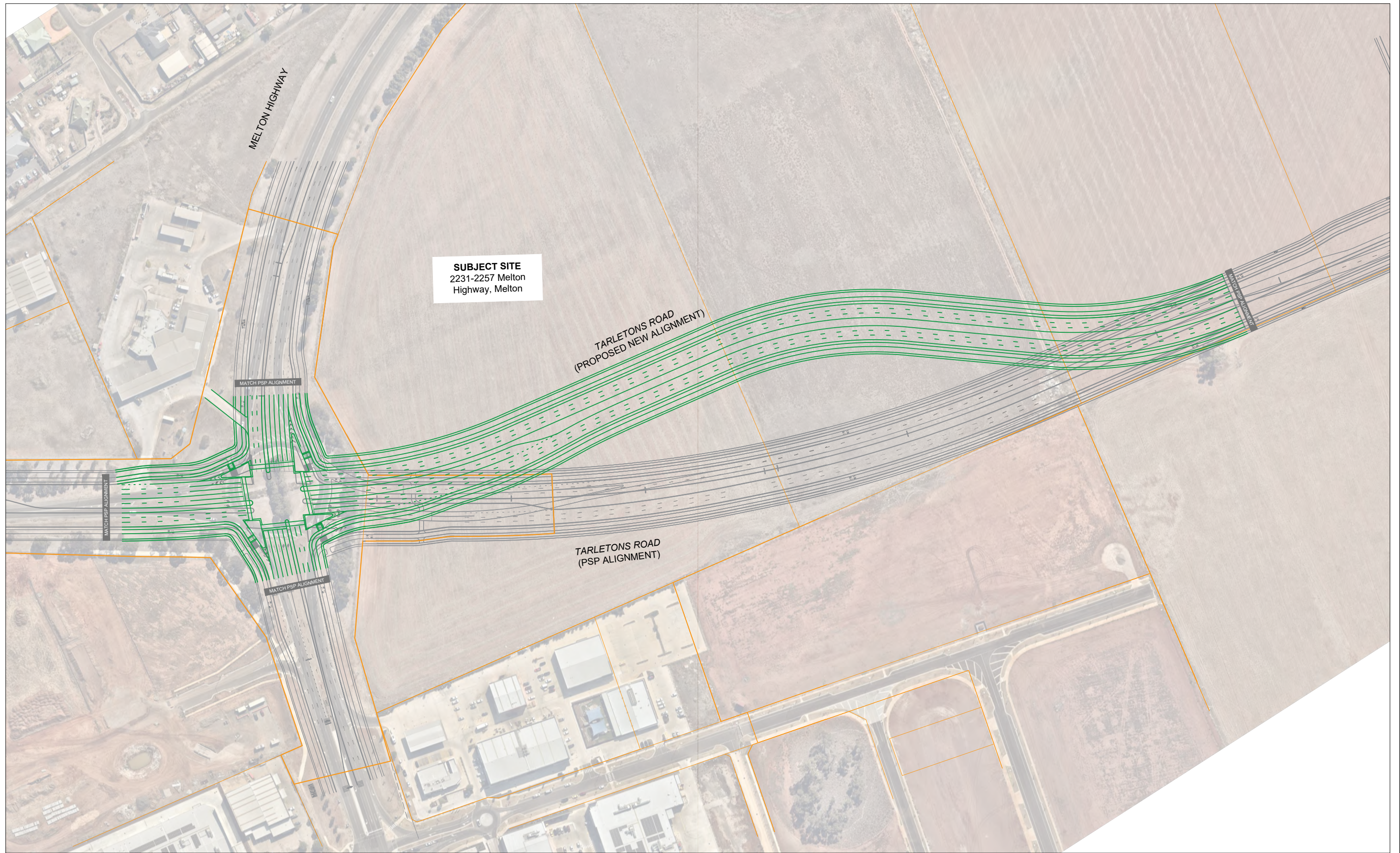
<b>Sewer</b>	<p><i>Plan 16 Utilities</i> proposes a sewer main in the southeast corner of site.</p>	<ul style="list-style-type: none"> <li>• Advice was received from Greater Western Water regarding sewerage servicing. GWW has confirmed that the site and adjoining industrial land are planned to be serviced by connection to the existing DN225 sewer in Melton Highway. The designated connection point is MH 24HIGH/1 on the eastern side of Melton Highway</li> <li>• Please find below in Appendix 2: Sewer and Drainage Strategy, the sewer concept plan illustrating an indicative sewer alignment. The alignment also includes land at 2171–2197 Melton Highway, which was previously expected to connect into the future Aintree network. This proposed servicing strategy supports the PSP staging by enabling early and coordinated development along the Melton Highway frontage. This outcome is supported by Maximise and we seek to ensure that this is ratified within the gazetted PSP.</li> </ul>
<b>Tarletons Road Alignment</b>	<p>Current alignment is curved to connect in with existing roundabout off Melton Hwy</p>	<ul style="list-style-type: none"> <li>• Tarletons Road has been designed to connect the precinct with the existing roundabout off Melton Highway however the alignment through the site results in irregular land parcels to the south.</li> <li>• These irregular land parcels are inefficient and reduce the development potential of land, particularly given the current location of the retarding basin. It also creates access challenges to the south of the site as without a right turn lane, the southern portion of the site becomes difficult to access. This disadvantages the future lot owners.</li> <li>• The existing Tarletons Road alignment has been reviewed by a traffic engineer, and the alternative proposed alignment has been developed in accordance with relevant Austroads design guidelines to ensure a satisfactory outcome. This revised alignment is more east-west and increases developable land of the subject site as well as the site to the east, which is especially desirable given the low NDA across the precinct. Please refer to Appendix 1 for further details.</li> <li>• Finally, there is potential for realignment of the property boundaries on Melton Highway to further increase developable land. The existing property boundary splays were previously set to accommodate the alignment of the existing roundabout, ensuring safe sight lines. Once the intersection is signalised, the Melton Highway alignment shifts west and the sight line requirements will be comfortably met with existing splays, like at most urban signalised intersections where the property lines follow the footpath.</li> <li>• There is therefore no inherent need to retain the existing splays as visible services appear to be located outside of the existing tree line. It therefore should be possible to realign the property boundaries parallel to</li> </ul>

		<p>Melton Highway, as close to the proposed future footpath as possible as seen in the below image.</p> 
Local Park	<p>LP-01 is located within Parcel 04 and abuts the eastern boundary of the site.</p>	<ul style="list-style-type: none"> <li>Local open space in the form of a Local Park (LP-01) is proposed to be located within industrial PSP Parcel 04 (immediately to the east of the site) and abuts the site's eastern boundary.</li> <li>The current location of LP-01 in the centre of the commercial and industrial area is inappropriate and it is highly unlikely that residents will walk through this industrial precinct to access a local park due to safety concerns. Therefore, locating LP-01 in an area that is more accessible for residents would provide greater community benefit.</li> <li>It is submitted that LP-01 should be relocated to the edge of the industrial precinct, or within the residential area itself, to enable residents to access the park safely without traversing through the industrial area. Proposing LP-01 in this location will provide better distribution of local open space that will service the future residents.</li> </ul>

Melton East Precinct Structure Plan –Submission regarding PSP requirements and guidelines		
Item	VPA Position	Maximise Submission
R18	<p>Subdivision and development involving the delivery of employment land must contribute to:</p> <ul style="list-style-type: none"> <li>• a form, scale and intensity of land use and activity that is compatible with adjacent land uses.</li> <li>• adaptable and changing uses, regeneration, and intensification initiatives</li> <li>• a range of lot sizes to cater to a diverse mix of businesses</li> </ul>	<p>It is submitted that this requirement should be amended as follows:</p> <p>Subdivision and development involving the delivery of employment land <b>should</b> contribute to</p> <ul style="list-style-type: none"> <li>• a form, scale and intensity of land use and activity that is compatible with adjacent land uses.</li> <li>• adaptable and changing uses, regeneration, and intensification initiatives.</li> <li>• a range of lot sizes to cater to a diverse mix of businesses.</li> </ul>
G42	<p>Subdivision in the light industrial area should align streets to create views and direct connections to the local park.</p>	<p>We propose this local park is shifted to the residential area, or its boundary, to maximise the catchment of users, and allow safer pedestrian access.</p>
R63	<p>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.</p> <p>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.</p>	<p>It is submitted that this requirement should be amended as follows to allow greater flexibility.</p> <p>Infrastructure and development staging <b>should</b> 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>
R35	<p>Drainage waterways are to be designed in accordance with Plan 7 Water and the relevant Melbourne Water Development Services Scheme. Waterways must be delivered to:</p> <ul style="list-style-type: none"> <li>• Provide safe drainage and flood protection</li> <li>• Incorporate environmental, cultural and amenity value</li> <li>• An open drainage system all to the satisfaction of Melbourne Water and the responsible authority.</li> </ul>	<p>Currently, the subject site is located outside of the Melton High Street drainage scheme, and we strongly submit that we should remain outside of it. Therefore, we propose the following amendment to this requirement:</p> <p>Stormwater conveyance and treatment are to be designed in accordance with the relevant Melbourne Water Development Services Scheme, <b>if applicable.</b></p>

R36	<p>Stormwater conveyance and treatment must be designed in accordance with the relevant Development Services Scheme or Development Services Strategy, and Plan 7 Water, such that:</p> <ul style="list-style-type: none"> <li>• Overland flow paths and piping within road reserves will be connected and integrated across property/ parcel boundaries</li> <li>• Melbourne Water and the responsible authority freeboard requirements for overland flow paths will be adequately contained within the road reserves and waterways</li> <li>• The risk of erosion of sodic and/or dispersive soils is avoided or mitigated to the satisfaction of Melbourne Water and the responsible authority.</li> </ul>	<p>Currently, the subject site is located outside of the Melton High Street drainage scheme, and we strongly submit that we should remain outside of it. Therefore, we propose the following amendment to this requirement:</p> <p>Stormwater conveyance and treatment must be designed in accordance with the relevant Development Services Scheme or Development Services Strategy, <b><u>if applicable</u></b>, and Plan 7 Water.</p>
R76	<p>Stormwater conveyance and treatment must be designed in accordance with the relevant Development Services Scheme to the satisfaction of Melbourne Water and the responsible authority. Final designs and boundaries of constructed wetlands, retarding basins, stormwater quality treatment infrastructure, and associated paths, boardwalks, bridges, and planting, must be to the satisfaction the responsible authority.</p>	<p>Currently, the subject site is located outside of the Melton High Street drainage scheme, and we strongly submit that we should remain outside of it. Therefore, we propose the following amendment to this requirement:</p> <p>Stormwater conveyance and treatment must be designed in accordance with the relevant Development Services Scheme, <b><u>if applicable</u></b>, to the satisfaction of Melbourne Water and the responsible authority.</p>

## **Appendix 1: Tarletons Road Realignment Concept Plan Package**

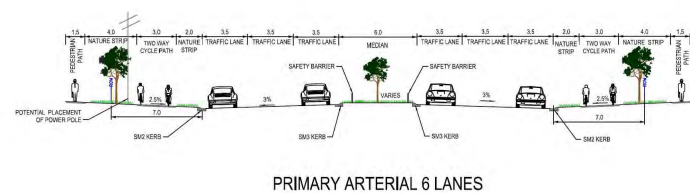
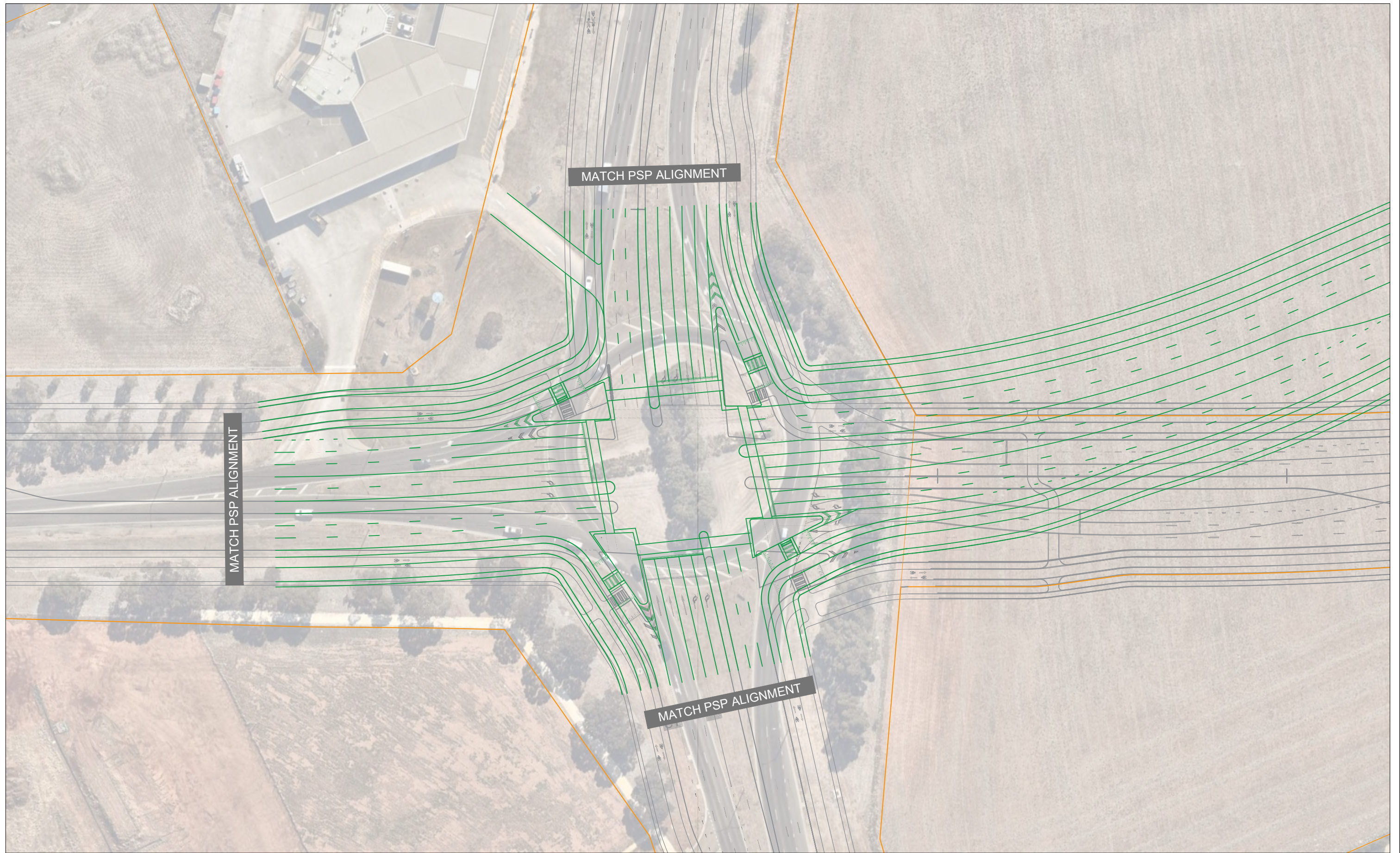


- NOTES:
1. East-west curved alignment based on design criteria for in AustRoads GTRD Part 3 - Geometric Design.

**2231-2257 Melton Highway, Melton**  
Melton East PSP - Altered Tarletons Road Alignment  
Concept Layout Plan - Overall View

DRAWN / CHECKED: JW/JW  
DATE: 27.03.2025  
DWG No: 25023-SK-01A  
SHEET No: 1 of 5  
REVISION: A  
SCALE: 1:2500 @ A3





**NOTES:**

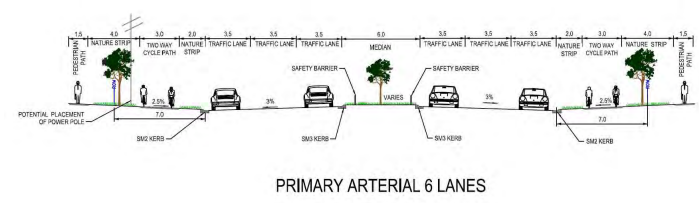
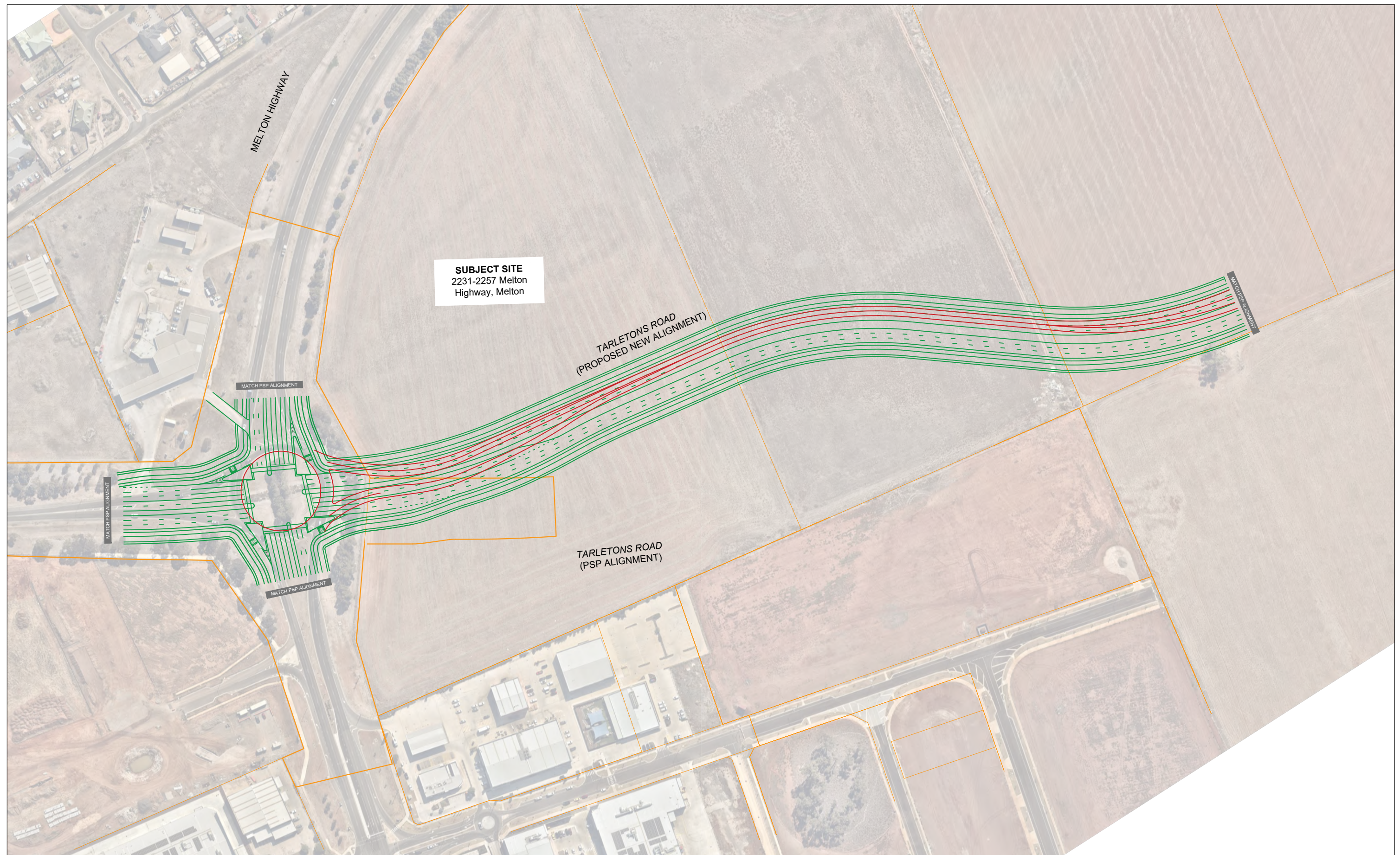
1. East-west curved alignment based on design criteria for in AustRoads GTRD Part 3 - Geometric Design.

**2231-2257 Melton Highway, Melton**

Melton East PSP - Altered Tarletons Road Alignment  
Concept Layout Plan - Signalised Intersection

DRAWN / CHECKED: JW/JW  
DATE: 27.03.2025  
DWG No: 25023-SK-01A  
SHEET No: 2 of 5  
REVISION: A  
SCALE: 1:1000 @ A3



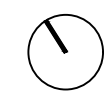


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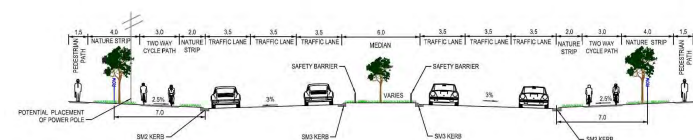
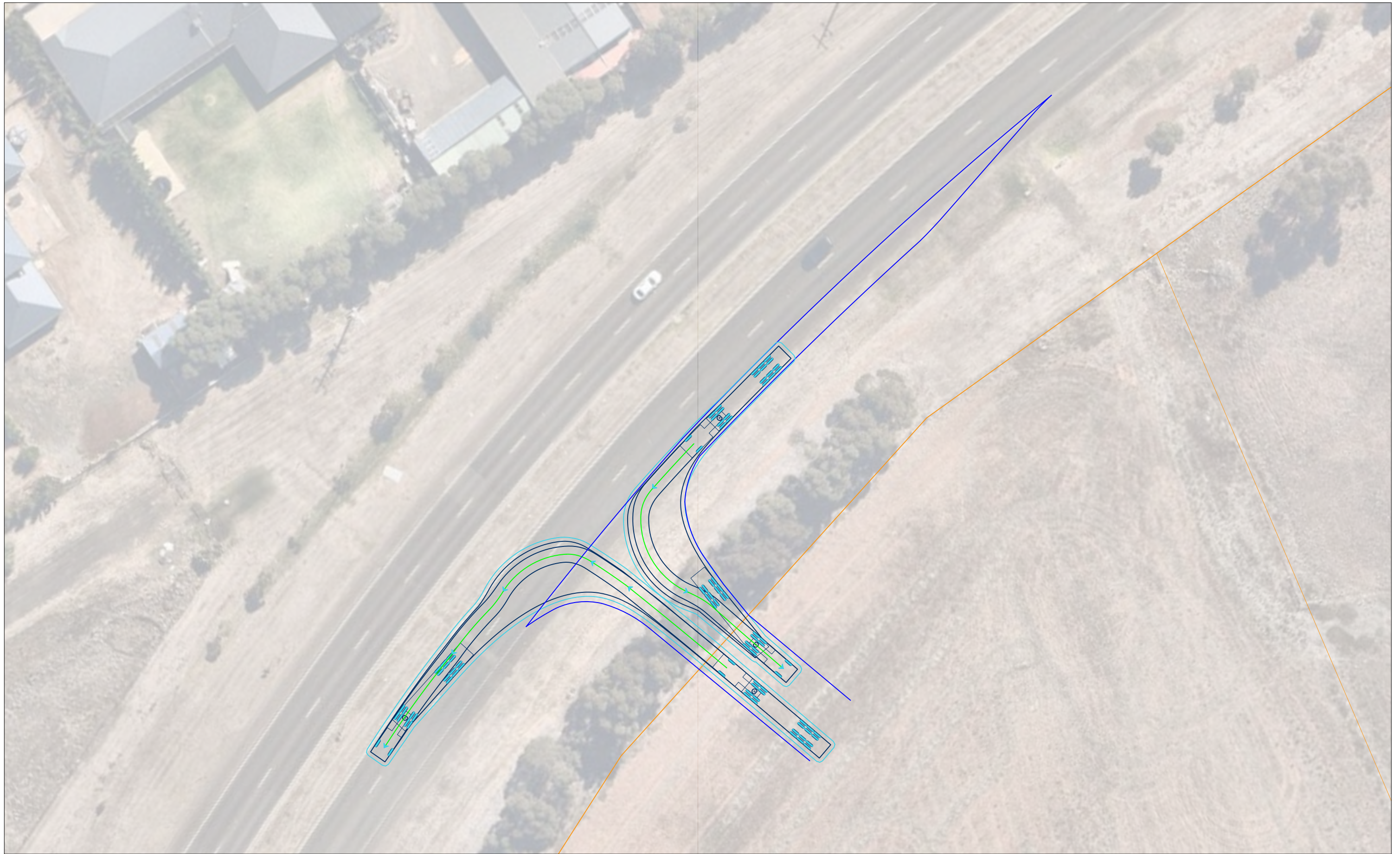
1. East-west curved alignment based on design criteria for in AustRoads GTRD Part 3 - Geometric Design.

**2231-2257 Melton Highway, Melton**  
Melton East PSP - Altered Tarletons Road Alignment  
Concept Layout Plan - Interim Roundabout  
Connection

DRAWN / CHECKED: JW/JW  
DATE: 27.03.2025  
DWG No: 25023-SK-01A  
SHEET No: 3 of 5  
REVISION: A  
SCALE: 1:2500 @ A3







PRIMARY ARTERIAL 6 LANES

NOTES:

1. Turn lane length based on Austroads GTRD Part 4A - Signalised & Unsignalised Intersections

**2231-2257 Melton Highway, Melton**


Melton East PSP - Altered Tarletons Road Alignment  
Concept Layout Plan - Property Access Option to  
Northern Portion of Site


DRAWN / CHECKED: JW/JW  
DATE: 27.03.2025  
DWG No: 25023-SK-01A  
SHEET No: 5 of 5  
REVISION: A  
SCALE: 1:500 @ A3





## **Appendix 2: Sewer and Drainage Strategy**

27 March 2025

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 dpmvic.com.au

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Notting Hill, Victoria 3168

ABN 47 006 550 803  
ACN 006 550 803

**Genna Walkley**

**Victorian Planning Authority**

**Level 25, 35 Collins Street**

**Melbourne VIC, 3000, Australia**

**SUBJECT: DRAFT AMENDMENT C244 MELTON EAST PRECINCT STRUCTURE PLAN  
SUBMISSION | SEWER AND DRAINAGE STRATEGY**

Dear Genna,

We act on behalf of the landowner of 2231–2257 Melton Highway and wish to formally object to the proposed expansion of the Melbourne Water Development Drainage Scheme (DDS) boundary, as outlined in the draft Melton East Precinct Structure Plan (PSP).

Before outlining our specific concerns with the proposed DDS boundary, we wish to emphasise that this site is uniquely suited to managing its own drainage, independent of the broader PSP scheme. It is owned by a single landowner, located at the top of the catchment, and will not be sold prior to development, making it one of the most straightforward and self-contained sites within the PSP area. The site can fully manage both drainage and water quality treatment on-site, with flows discharged to the south. Development is intended to commence within the next two years, and removing the site from the scheme would enable this by eliminating reliance on downstream DDS infrastructure, supporting timely, efficient delivery in line with the PSP's staging intent.

While we support coordinated infrastructure planning, the proposed drainage arrangement introduces significant concerns relating to PSP staging, industrial land delivery, and efficiency on infrastructure delivery. We respectfully request that the DDS boundary be reconsidered as it applies to our client's land, for the following reasons.

**Misalignment with PSP Staging and Original Drainage Strategy**

The subject site was not included in earlier versions of the Melbourne Water DDS, and its inclusion in the latest boundary map appears to have occurred without consultation or transparent catchment-based rationale.

Importantly, this site forms part of Stage 1 of the Melton East PSP, with direct access to Melton Highway, making it ideally placed for early development. Under the original PSP drainage strategy, when the site was outside the DDS, the site was to be serviced by a local drainage solution, involving on-site attenuation



and discharge of pre-developed flows directly into the existing drainage infrastructure within Melton Highway.

This approach was entirely consistent with both the site's natural topography and the PSP's staging framework. The recent inclusion within the DDS would require the site to depend on future downstream assets to the east, undermining the ability to deliver early development and creating unnecessary reliance on infrastructure that may not be available within the Stage 1 timeframe as per the PSP intent.

### **Impact of Wetland Retarding Basin (WLRB) on Industrial Land Delivery**

Although the entire site is zoned for industrial use, the Melton Highway frontage holds the highest strategic and commercial value, and forms a key visual and access point for the precinct. The current drainage layout proposes a Wetland Retarding Basin (WLRB) across this frontage, directly reducing the site's development potential.

We acknowledge that a surface basin is a valid drainage option. However, the proposed size and placement of the WLRB significantly constrains land use flexibility and reduces the Net Developable Area (NDA) of the subject site and the broader PSP.

We believe there is opportunity to further refine the WLRB design to reduce its footprint and mitigate its impact on industrial delivery, and we intend to submit a formal design response on this basis.

### **Underground Detention System with Tertiary Treatment**

To preserve the most strategic and visible parts of the site, we ask that the PSP allow flexibility for an underground stormwater detention system, which could be located beneath internal roads and parking areas.

While this would not provide treatment on its own, our client is committed to achieving Melbourne Water's Best Practice Environmental Management (BPEM) targets through the use /combination of varies of treatment options, including tertiary proprietary treatment products. This combined approach can deliver both flow attenuation and environmental compliance, in a way that protects industrial capacity and staging viability.

### **Engineering and Economic Consequences of DDS Arrangement**

The proposed DDS arrangement would require stormwater to flow against the natural grade, toward the east. This change would result in a deepening of downstream drainage infrastructure, including wetlands and retarding basins within the DDS.

The consequences of this include:

- More complex and expensive construction, due to increased excavation and structural requirements on scheme drainage assets.
- Larger wetland footprints, deeper assets require larger reserve areas/ footprints, further reducing NDA and diminishing industrial capacity.
- Higher DDS infrastructure costs, which are passed on to developers through scheme contributions—unnecessarily increasing overall PSP development costs.



Moreover, it is technically unfeasible to convey overland flows in the proposed direction unless a dedicated 1% AEP pipe is constructed within the DDS. Such a pipe would be costly, complex, and inconsistent with the practical delivery of Stage 1 development.

### **Request for Amendment**

Given the above, we respectfully request that:

- The DDS boundary be reverted to exclude 2231–2257 Melton Hwy, restoring the original drainage intent of the PSP;
- The PSP provide for either:
  - a refined Wetland/Retarding Basin design (Subject to further DPM Submission)
  - a developer-funded underground detention system paired with appropriate tertiary treatment.
- And that VPA and Melbourne Water collaborate with landowners to ensure drainage solutions are feasible, cost-effective, and aligned with PSP staging and employment outcomes.

We remain open to ongoing engagement and are committed to supporting a drainage outcome that balances engineering functionality with efficient, well-sequenced development.

### **Sewerage Servicing Strategy**

Greater Western Water has confirmed that the subject site at 2231–2257 Melton Highway, along with adjoining land at 2199–2229 Melton Highway, is planned to be serviced by connection to the existing DN225 sewer located within Melton Highway. The designated connection point is at MH 24HIGH/1, on the eastern side of the road. A sewer concept plan illustrating the indicative alignment is attached at the back of this letter. The alignment also includes land at 2171–2197 Melton Highway, which was previously expected to connect into the future Aintree network. This proposed servicing strategy supports the PSP staging by enabling early and coordinated development along the Melton Highway frontage.

Any further queries can be made to the undersigned: -

A handwritten signature in blue ink, appearing to read 'Eric Wang'.

**Eric Wang | Principal Engineer**

**MIEAust, CPEng, B.E. EnvEng, RPEng, NER**

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