



## VIP WOODLANDS ESTATE PTY LTD

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31 March 2025

Victorian Planning Authority  
RE: Melton East PSP

*Via online portal*

To whom it may concern,

### **SUBMISSION TO AMENDMENT C244MELT**

Thank you for the opportunity to provide a submission to Amendment C244melt (the Amendment) to the Melton Planning Scheme. This submission is made by VIP Woodlands Estate Pty Ltd (VIP Pty Ltd), a related entity to the owner of 21.95 hectares of land at 989-1029 Beattys Road, Grangefields (the subject land).

We understand this Amendment seeks to implement the Melton East Precinct Structure Plan (the PSP) and the Melton East Infrastructure Contributions Plan (the ICP) into the Melton Planning Scheme. The subject land is impacted by both the PSP and ICP. Accordingly, this submission is made by an affected landowner.

Amendment C244melt to the Melton Planning Scheme seeks to “*implement the Melton East PSP which facilitates the use and development of the PSP area as a predominately residential precinct comprising 12,900 dwellings for 40,014 people, and approximately 23 hectares of employment land for an anticipated 2,000 jobs. To service this new population, the amendment provides for two neighbourhood activity centres and two local convenience centres, approximately 53 hectares of open space and the provision of a Drainage Services Scheme*”. The purpose of the Amendment will be implemented through changes to the Melton Planning Scheme. In relation to the subject land, the Amendment seeks to:

- Apply the Urban Growth Zone – Schedule 13 (UGZ13);
- Apply the Infrastructure Contributions Overlay – Schedule 4 (ICO4); and,
- Apply the Public Acquisition Overlay – Schedule 14 (PAO14) to part of the land.

VIP Pty Ltd supports the intent of Amendment C244melt, and consequently, its focus to encourage the provision of additional housing opportunities within the municipality. The review undertaken of the exhibited material has, however, highlighted concerns regarding the ability to deliver housing in a viable and efficient manner. The extent of developable land within the precinct is of particular concern, along with Requirements and Guidelines included within the PSP that seek to mandate ambitious density and typology outcomes. As such, VIP Pty Ltd supports the Amendment, but requests that changes are made prior to finalisation and approval.

## Summary of Position

VIP Pty Ltd's position in respect to Amendment C244melt is summarised below:

- 1) **Density:** The PSP's approach to density is concerning, particularly in relation to the identified 'amenity areas' and the density targets prescribed. The average density envisaged by the Melton East PSP is well beyond the relevant T1-T3 performance targets specified in the PSP Guidelines 2021 without valid justification to ensure that the prescribed densities can be delivered within the Melton East greenfield setting in the short or medium term.
- 2) **Anticipated Resident Population:** The PSP adopts an anticipated population of 40,015 persons within the precinct (PSP Table 5), assuming a household size of 3.1 persons per dwelling. The PSP average household size figure is significantly higher than the 2021 ABS estimate of 2.58 persons per dwelling for the Greater Melbourne area and does not differentiate between balance residential (20 dwellings per NDHA) or amenity residential areas (30-40 dwellings per NDHA). It is concerning that the provision of open space and community facilities may be based on potentially flawed future resident population and density assumptions.
- 3) **Typologies:** The target typologies require further review and do not appear to be reflective of the type of housing product which are considered viable within the precinct for the foreseeable future. Our view is that R1, G1 and Table 3 of the PSP are overly restrictive, and as currently drafted, will likely constrain development in the precinct. It needs to be recognised that land lots occupying single dwellings, being standard (greater than 300sqm in area) or small (i.e. subject to the Small Lot Housing Code, being less than 300sqm) are the most efficient and popular housing typology delivered in the greenfield market. The PSP needs to allow for the provision of land lots within amenity areas, with this typology included within Table 3 as appropriate.
- 4) **Affordable Housing:** The affordable housing target of 12 per cent is not viable. The Housing Needs Assessment Report is not reflective of the household types expected to occupy the PSP area, and in our view, cannot be relied upon to provide guidance on built form outcomes within the precinct. Whilst affordable housing is a fundamental issue in the housing market, lots to be delivered via the Melton East PSP will be inherently affordable and this PSP is not considered the appropriate vehicle to deliver the specific housing outcomes as identified (i.e. prescribing dwelling types based on number of bedrooms).
- 5) **Net Developable Area:** The extent of uncredited open space attributed to the PSP, being some 274.78 hectares (54% of NDA), appears excessive and must be reduced in order to promote viable development within the precinct. This is a fundamental issue that requires thoughtful consideration across the precinct. It is clear that the NDA for the subject land can be increased through a more efficient approach to land use planning.
- 6) **Drainage / Cultural Heritage:** The drainage solution as presented in the PSP is inefficient and results in an overall Net Developable Area (NDA) which is far too low. Our view is that the assumptions made within the PSP are overly conservative, particularly in relation to the extent of 'Other uncredited open space' within the precinct. Further:
  - a. We question the application of the archaeology sensitivity model (Plan 17 of the PSP) developed as part of the Aboriginal Cultural Heritage Impact Assessment and its role in determining the application of 'Other uncredited open space' throughout the precinct.
  - b. Similarly, we hold concerns that extensive areas of land have been quarantined without appropriate rigour or regard to the process legislated under the Aboriginal Heritage Act 2006.
  - c. It is acknowledged that the proposed waterway RB-15 and wetland in the northeastern corner of the site RB-14 are required for stormwater conveyance and treatment. The land-take associated with RB-12, which abuts the western boundary of the subject land is however considered excessive. We submit the landholding to the west has sufficient capacity to easily accommodate this drainage asset, as such there is no reason why the subject land should be encumbered.

- d. We support an efficient drainage outcome that is integrated with the cultural heritage and ecological values of the precinct. Such an approach would reduce the extent of 'Other uncredited open space' within the subject land and across the precinct.
- 7) **Amenity:** Plan 6 of the PSP identifies that a portion of the subject land is not within 400 metres of a local park. This circumstance is observed elsewhere in the precinct, contributing towards only 82% of future dwellings being within 400 metres of a local park – well short of the T12 performance measure of 95%. We suggest that the 'Other uncredited open space' which occupies most the south-western corner of the subject land is removed, with this land replaced with residential NDA and a local park to the immediate south of waterway RB-15. This park can accommodate the southern most 'vegetation to be retained' (as per Plan 8 of the PSP) and can form a size and shape similar to that adopted for LP-08 and LP-09.
- 8) **PSP / ICP Land Budget:** The 'Total Area' for Property 75 and 76 within the PSP and ICP land budget is incorrect. As per the copy of title at Appendix A, the total area is 21.95 hectares, rather than 22.06 hectares. It is important that this correction is made given future ICP monetary levy and land equalisation requirements.
- 9) **Pedestrian and Cycle Crossings:** Requirement R12 mandates that pedestrian and cycle crossings are provided every 400-800 metres across arterial roads, waterways and any other accessibility barriers. Given the scale and extent of waterway and drainage land on the site (which extends into neighbouring properties outside of our control), this could present a significant expense and become a complicating factor during the planning permit phase. For this reason, the location of crossings across waterways and drainage land should be confirmed within the PSP, and the cost recovered through the ICP if necessary.
- 10) **ICP Projects:** The ICP identifies the following projects within or adjacent to the subject land:
  - a. RD-05-02: Supplementary levy, primary arterial road (interim)
  - b. IN-14: Supplementary levy, construction of fourth leg at a primary/connector road intersection.
  - c. IN-17: Standard levy, construction of fourth leg extension of existing primary arterial road into the PSP area.
  - d. CU-05: Standard levy, construction of a culvert under a 4-lane primary arterial road (interim).
  - e. CU-06: Standard levy, construction of a culvert under a 4-lane primary arterial road (interim).

The subject land carries a considerable public infrastructure burden, whilst being limited to only 12.4 hectares of NDA. We reserve the right to independently review designs and costings associated with the above ICP projects, including supplementary levy items RD-05-02 and IN-14.
- 11) **ICP Monetary Levy and Obligations:** We submit that the ICP supplementary rate is excessively high and the required infrastructure provision is not commensurate with the quantum of NDA delivered by the PSP. It is clear that the NDA within the precinct needs to increase, whilst at the same time ensuring the ICP supplementary projects are not excessive or wasteful in any manner.
- 12) **Infrastructure and Delivery Staging:** We support the identification of Leakes Road and Beatty's Road as the initial development front for the precinct and inclusion of the subject land within Stage 1 at Plan 12 - Infrastructure and Development Staging. This said, the PSP/ICP must allow for interim access and drainage outcomes for the subject land given the extent of ICP projects which abut the subject land and limited ability to utilise potential WIK credits.
- 13) **Modifications to Schedule 13 of UGZ:** The following amendments to the UGZ13 are recommended:
  - a. Table 1 of Schedule 13 applies the Residential Growth Zone – Schedule 1 (RGZ1) to land identified as 'Area of increased density', including:
    - i. within the subject land this includes land within 400 metres of the Rockbank North activity centre (high amenity).
    - ii. within 50 metres of open space (including uncredited open space) and 50 metres of Leakes Road (standard amenity).

We question whether the application of the RGZ1 to standard amenity areas are appropriate and consistent with PPN91.

- b. Update the Schedule to confirm that the application requirements relating to 'Environmentally Sustainable Development' do not apply to subdivision.
- c. We question the need to undertake an Acoustic Assessment Report for the subject land. The PSP Background Report states that the subject land is included within a noise influence area due to the subject land's proximity to a 'future 6 lane arterial road', being Leakes Rd. We note that the Melton East ICP contemplates delivery of a 4-lane primary arterial, not the ultimate 6-lane configuration. The utility of commissioning such a report is questionable given the status of the ultimate upgrade to Leakes Road and the likely assumptions that would need to be adopted to produce such a report.

VIP Pty Ltd reserves the right to make further submissions in respect to any matter relevant to the Melton East PSP, ICP and associated planning scheme ordinances at a later date, including at a potential Panel hearing.

## **Conclusion**

We commend the VPA on the effort and extensive work that has been undertaken in preparation of the Melton East PSP, ICP and the background documents which have informed Amendment C244melt as exhibited. In our view, the queries, concerns and suggested changes raised in this submission warrant closer consideration, however we are positive that they can be addressed and resolved prior to finalisation and approval of the Amendment. We welcome and look forward to the opportunity to discuss this matter with the VPA.

Should you have any further questions please feel free to contact the undersigned.

**Sincerely,**



**Peng Hong Wong**

**Director**

## APPENDIX A – COPY OF TITLE

TITLE PLAN		EDITION 1	TP 310048E
<b>Location of Land</b> Parish: KOROROIT Township: Section: 7 Crown Allotment: 4A, 4B Crown Portion:  Last Plan Reference: Derived From: VOL 9128 FOL 175 Depth Limitation: NIL		<b>Notations</b>  ANY REFERENCE TO MAP IN THE TEXT MEANS THE DIAGRAM SHOWN ON THIS TITLE PLAN	
<b>Description of Land / Easement Information</b>		THIS PLAN HAS BEEN PREPARED FOR THE LAND REGISTRY, LAND VICTORIA, FOR TITLE DIAGRAM PURPOSES AS PART OF THE LAND TITLES AUTOMATION PROJECT COMPILED: 09/02/2000 VERIFIED: GB	
<p style="text-align: center;"><b>TOTAL AREA = 21.75 ha</b></p>			
LENGTHS ARE IN METRES		Metres = 0.3048 x Feet Metres = 0.201168 x Links	
			Sheet 1 of 1 sheets