

Friday, 4 April 2025

Victorian Planning Authority

Via email: Genna.Walkley@vpa.vic.gov.au

Dear Genna,

DRAFT AMENDMENT C244 MELTON EAST PRECINCT STRUCTURE PLAN SUBMISSION

Veris acts on behalf of Synergy Living Developments Pty Ltd (Synergy), the owners of the land at 1072-1114 Beattys Road (the site) within the Melton East Precinct Structure Plan (PSP) area. The below sets out Synergy'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 south-east of the Melton East precinct (Parcel 54) and has been identified as future residential land with portions of increased residential density. Currently, there is a government school, local community facility and connector road proposed through the centre of the site with conservation areas along the northern boundary. Pursuant to draft Urban Growth Zone – Schedule 13 within the Melton Planning Scheme, the proposed applied zone is Residential Growth Zone 1 (RGZ1) for areas of increased density, and General Residential Zone (GRZ), for the balance of the residential land which allows for a diversity of housing types and housing growth particularly in locations offering good access to services and transport. Overall, the site forgoes approximately 50% of its Net Developable Area, due to the various constraints imposed on the land.

Plan 3 Housing classifies the areas of increased density within the site as standard amenity areas which applies to land within 50m catchment of open space, the PPTN, local convenience centres and future public transport corridors. The minimum density to be achieved in this area is 30 or more dwellings per NDHa with planning permits to deliver at least three (3) different housing typologies including apartments, attached townhouses and semi-attached duplex style development. The balance of residential land seeks to achieve a minimum density of 20 dwellings or more per NDHa.

Kororoit Creek borders the site along the northern boundary and to the east, the site abuts residential land containing areas of increased density. Currently, Beattys Road creates the southern border of the site however it is proposed to be upgraded to Taylors Road, departing from its existing alignment to curve to the south and join up with the existing Taylors Road at its intersection with Leakes Road to the east. The western border of the site is proposed as a connector street boulevard, facilitating connection to the north of the PSP area. *Plan 4 Movement Network* within the draft PSP demonstrates the alignment of the 25m connector road through the site, off-road shared paths, Leakes Road connector street boulevard along the western boundary, and off-road 2-way bike path/pedestrian paths.

Melbourne

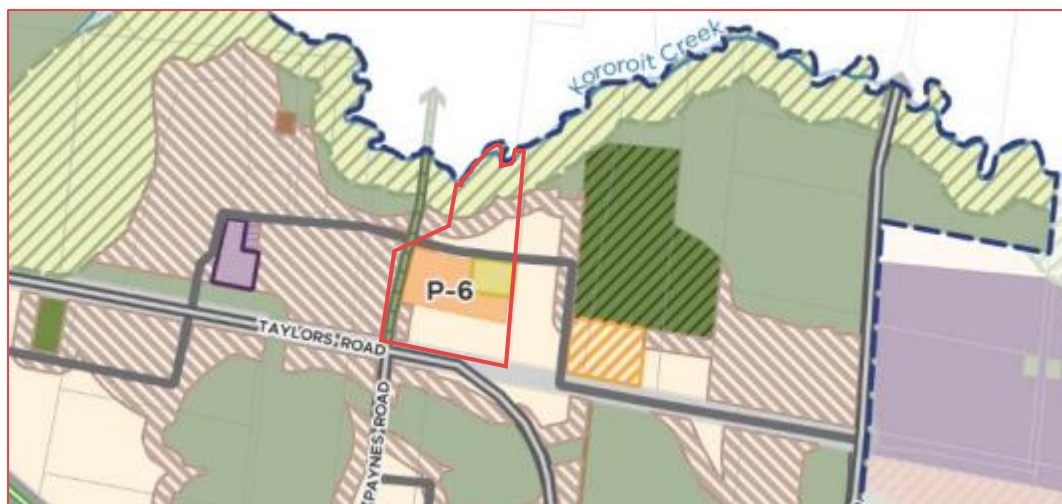
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Submission Grounds

Of particular concern to the landowner 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:

- Synergy strongly objects to the location of the proposed government school. The current school location does not provide space for a local north-south road through the site which would allow residential development to occur to the north before the school is developed. The northern portion of the site is essentially landlocked, creating dependency on road infrastructure being delivered by surrounding landowners. Firstly, it is submitted that the school should be relocated further west, closer to the neighbourhood activity centre demonstrating strategic clustering of land uses. As an alternative, if the school must remain on the site, it should at a minimum, be reorientated to allow for a north-south road (Access Street Level 2) to sit inside the eastern boundary to enable development of the northern residential portion and allow for subdivision of the school site. Please refer to Appendix 1 Concept Plan for further details.
- The Paynes Road extension alignment is across Parcel 53 and Parcel 54, preventing either land parcel from constructing this road in its ultimate form without cooperation from the adjoining land parcel. Additionally, the alignment creates a small, irregular sliver of land that would have to be developed as part of Parcel 52. This section of Paynes Road north of Beattys Road should be realigned so it sits primarily within Parcel 54, allowing development to commence without reliance on adjacent land holders and increasing NDA.
- The intended speed limit of Beattys Road is not specified. We submit that the speed limit should be 60km per hour otherwise there is risk that any intersections on Beattys Road would be classified as Supplementary items in the ICP and increase costs. Additionally, the existing Beattys Road pavement should be realigned to the south to enable access to the site and utilise the existing road infrastructure which we understand has been built to a high standard, is in good repair and could be readily urbanised in an efficient manner. Please refer to Appendix 1 Concept Plan for an example of this.
- We seek the deletion of the 1.5m footpath from the Local Access Street Conservation Area Interface cross section to reduce unnecessary hard surface within the road environment. A single shared path of 3m should be located within the conservation area to reduce hard surfaces and allow canopy trees to be planted on both sides. This is reflected in other developed areas adjacent to Kororoit Creek downstream.

- We require clarification on the extent and width of the nature strip required against the bushfire hazard as illustrated in Bushfire Hazard Buffer Treatment Local Access Street 1 cross-section applicable along the northern perimeter of the site.
- Intersection IN-12 between Paynes Road and the east-west Connector Road is split across the subject land and Parcel 52, making it difficult to coordinate construction and potentially delaying an interim connection of Paynes Road and the E-W connector at this location. Additionally with the downgrade of Paynes Road to a connector boulevard road, we strongly submit that this intersection is changed to a roundabout. This should be funded by the ICP given its unique context in proximity to school and future arterial road to the north.
- Given the site's frontage to the existing Beattys Road, which provides a high-quality access point to Leakes Road, there is no reason that development could not progress on the subject site immediately and the site included in Stage 1. The school site location also supports inclusion in Stage 1 as DET often prefers the ability to secure sites early if possible.
- Finally, we submit that the catchment for higher density housing surrounding the NAC should be expanded to 800m in accordance with the activity centre catchment shown in Plan 5. The site also benefits from proximity to the major activity centre to the east that is located just outside of the PSP boundary. This activity centre is almost 10 times the size of the NAC to the west of the site yet the same 400m catchment for increased residential density has been applied.
- Overall, Synergy has lost 50% of the site's NDA with roads, government school, community centre and conservation area. Given approximately half of the PSP area is locked up by conservation areas and wetlands, any land that can be converted to developable is beneficial.

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;
- Concept Plan prepared by Charlton Degg

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

Item	VPA Position	Synergy Submission
Proposed government school location (P-6)	Government school P-6 is proposed to be located in the centre of subject site.	<ul style="list-style-type: none"> <i>Plan 11 Community Infrastructure</i> within the draft PSP proposes a government school (P-6) and community facilities (CI-03) in the centre of the site. The current school location is not justified within the Community Infrastructure Assessment prepared by ASR and the current east-west connector road means the site is subject to surrounding sites being developed to deliver the road to access the northern portion of developable land. This essentially creates landlocked residential land in the northern part of the site which is a significant issue as those are the areas of proposed higher density that seek to facilitate an average of 30 dwellings per NDHa. This reduces availability of residential land that is essential for the timely and efficient delivery of the PSP. Firstly, it is submitted that the school site and community facilities should be relocated onto the western side of the boulevard connector road to sit between the Neighbourhood Activity Centre and road. This clustering of land uses demonstrates a better outcome for the community and more strategic land use planning. The Laurimar town centre in Whittlesea provides precedent for co-locating a primary school and a local convenience centre and generates greater community benefit through increased accessibility to local facilities, shops as well as promoting walkability within the precinct. We strongly believe the proposed relocation of the school demonstrates well-considered integrated development. As an alternative, if the school must remain on the site, it should be reorientated to allow for a north-south road (Access Street Level 2 minimum 20m) to fit along the eastern boundary to enable development of the northern residential portion as well as allow for subdivision of the school site. Please refer to attached plan for further details. In this case, the community facilities should be relocated to the NAC, to co-locate community facilities allow for more efficient land use clustering and integrated development.
Paynes Road alignment	The Paynes Road extension alignment is split across the subject site and Parcel 53 creating difficulties in delivery and severing the land.	<ul style="list-style-type: none"> The Paynes Road extension alignment is across Parcel 53 and Parcel 54, preventing either land parcel from constructing this road in its ultimate form without cooperation from the site. Additionally, it leaves a small, irregular sliver of land that would have to be developed as part of Parcel 52. The proposed section of Paynes Road north of Beattys Road should be realigned so it sits primarily within the subject site, allowing development to commence without reliance on adjacent land holders.

		<ul style="list-style-type: none"> This realignment would also remove the irregular sliver of land and increase NDA for the subject site which is considered highly valuable in this location within the catchment of the neighbourhood activity centre.
Beattys Road cross-section and realignment	<p>A non-standard cross section is proposed for Beattys Road, named a 'Primary Arterial Compressed' cross section within a 34m road reserve.</p> <p>The intended speed limit of Beattys Road is not specified.</p> <p>The current Beattys Road pavement is not proposed to be utilised within the future PSP.</p>	<ul style="list-style-type: none"> A non-standard cross section is proposed for Beattys Road, named a 'Primary Arterial Compressed' cross section within a 34m road reserve. This terminology is inconsistent with DTP's guidelines for the growth areas which requires Primary Arterials to be 6 lanes (ultimately) with a road reserve of 41m. Secondary Arterials are 34m with 4 lanes and a 60kph design speed. The land required for a Primary Arterial for both road width and intersections is significantly greater than what's needed for Secondary Arterial, resulting in greater costs for intersections during construction. This concept was put forward in the Beveridge North West PSP, whereby a 34m wide road corridor was termed a Primary Arterial and given a design speed of 80kph. Consequently, all intersections on this arterial had to be supplementary items in the ICP as they do not conform to the VPA Benchmarks and are much larger than standard Secondary Arterial intersections. The intended speed limit of Beattys Road is not specified within the draft PSP. We submit that the speed limit should be 60km per hour otherwise there is risk that intersections on Beattys Road would be classified as Supplementary items in the ICP and increase costs across the precinct. Additionally, if the existing Beattys Road is realigned to the south, then the existing road corridor of 63m could be developed to allow access to the site. The PSP suggests that it will be used for a bike path however that could easily be incorporated into the future road corridor. These significant areas of existing road reserve should be utilised for road construction (as they were intended) rather than aligning new arterial roads through otherwise developable land which has significantly increased the cost of the ICP. Otherwise, this well-built and maintained road is being wasted with no purpose within the PSP. See below image and refer to attached Concept Plan for further details.

		
Conservation Area Road Interface	<p>'Local Access Street Residential – Conservation Area Interface' along the entire northern boundary is a hybrid of a standard access street (16m).</p>	<ul style="list-style-type: none"> • The subject site has a requirement to provide the 'Local Access Street Residential –Conservation Area Interface' along the entire northern boundary. • This cross-section is a hybrid of a standard access street (16m) with a 7.3m pavement and 1.5m footpath but extended on the conservation side to include a bike only (3.0m) path plus a separate 1.5m pedestrian path with 0.9m between. This arrangement adds to the heat island effect and creates a 5.4m wide stretch of concrete with limited ability to add tree canopy. • In comparison, a single shared path of 3m located within the conservation area would be more appropriate for a recreational trail along Kororoit Creek. This shared path would ideally meander through the reserve rather than be contained within a widened road reserve and maintains the current size of the Conservation Area as per the PSP. • This would make the 1.5 footpath redundant and allow canopy trees to be planted on both sides as well as creating a smaller road reserve. This reflects similar outcomes further downstream within the developed areas adjacent to Kororoit Creek. • Therefore, we seek formal deletion of the 1.5m footpath from the Local Access Street Conservation Area Interface cross section. This provides benefits of reducing unnecessary hard surface within the road environment, increased opportunities for tree planting, and increases available NDA which increases the collection of ICP levies which appears to be a major issue in the ICP. • Additionally, the road pavement (currently proposed as 7.3m wide) could be reduced to 5.5m with indented parking on the resident's side to further reduce hard surfaces and provide a slower speed environment. The road pavement can be reduced as there will be residential dwellings on one side only.
Bushfire Hazard Buffer Treatment	<p>Bushfire Hazard Area A applies to the northern perimeter of the site.</p>	<ul style="list-style-type: none"> • We require clarification on the extent and width of the nature strip required against the bushfire hazard as illustrated in Bushfire Hazard Buffer Treatment Local Access Street 1 cross-section.

	Therefore, this portion of the site is subject to Bushfire Hazard Buffer Treatment Local Access Street 1 cross-section.	<ul style="list-style-type: none"> The cross-section in the PSP does not specify a width and states that the width varies. This would leave the extent of road abutting the bushfire hazard areas up for interpretation at a later stage, increasing uncertainty and may impact developable area.
Intersection IN-12 and Bridge BR-02	<p>BR-02 is partially funded by the Warrensbrook PSP and partially by the Melton East ICP.</p> <p>Intersection IN-12 connects Paynes Road and the east-west connector road through the site.</p>	<ul style="list-style-type: none"> Given Paynes Road has been downgraded to Boulevard Connector Road, the proposed IN-12 is unlikely to be necessary and should be changed to a roundabout in this location. This would significantly lower the cost of construction. We submit that in this unique circumstance, the roundabout should be funded by the ICP given the location of the school and the fact that the arterial road is earmarked to continue to the north in the future. Currently, IN-12 between Paynes Road and the east-west Connector Road is split in half across the subject land and Parcel 52, making it difficult to coordinate construction. A shift in the north-south and east-west road and changing IN-12 to a roundabout would address this issue. Alternatively, if not a roundabout, we submit that the signalised intersection IN-12 will only need to be delivered when bridge BR-02 across Kororoit Creek is constructed. Without the bridge and subsequent through traffic volumes, there is no need for traffic signals. If the northern leg was unconstructed, the intersection could operate as an unsignalized T-intersection until the bridge and road was connected to the north. Furthermore, BR-02 is partially funded by the Warrensbrook PSP which is a Tier 3 PSP and is yet to commence. This provides no certainty around the timing of construction. Even if this PSP had commenced, we submit that it is unlikely this bridge connection is needed until close to ultimate buildout given it only provides a Boulevard Connector standard road and no connection to the Western Freeway. Finally, Road Project RD-04-01 is shown extending into the future Warrensbrook PSP however, the description of this road item is that it extends from the Bridge (BR-02 to IN-12) and is 100% proportioned to Melton East PSP. This appears to be an editing error rather than an intent to apportion the road project and we seek confirmation of this from the VPA.
Staging	<i>Plan 12 Infrastructure and Development Staging</i> shows the subject site as nominated as Stage 2.	<ul style="list-style-type: none"> The subject site has been nominated as Stage 2 for infrastructure delivery, Given the sites frontage to the existing Beattys Road, which provides a high-quality access point to Leakes Road there is no reason from a transport perspective that development could not progress on the subject site immediately and the site included in Stage 1. This is further justified through the nomination of the school site. From our experience in other PSP areas, Council and DET want to bring forward the provision of school sites, or at the very

		least protect their ability to be delivered early in a PSP. The Melton East PSP staging plan does the opposite, which is contrary to this approach elsewhere.
Increased residential density (expanding catchment)	<p>The northern portion of the site is classified as increased residential density with the rest of the site shown as balance residential land.</p> <p>Whilst <i>Plan 5</i> shows 800m walkable catchment from activity centres, only a 400m catchment has been applied for areas of increased residential density.</p>	<ul style="list-style-type: none"> • We submit that the catchment for higher density housing surrounding the NAC should be expanded from 400m to 800m in accordance with the employment and activity centre catchment shown in <i>Plan 5</i>. Additionally, this catchment should acknowledge the major activity centre to the east that lies just outside of the PSP boundary. This activity centre is almost 10 times the size of the NAC to the west of the site yet only a 400m catchment has been applied to identify areas of increased residential density. • Given the low NDA across the precinct, it is important to consider the opportunity to expand the catchment for increased residential density, increasing housing diversity and enabling the PSP to meet its overall housing and density targets. • Especially if the school remains on the site, there is further justification for increased residential density in proximity to the school and community facilities.

Melton East Precinct Structure Plan –Submission regarding PSP requirements and guidelines		
Item	VPA Position	Synergy Submission
R1	Residential subdivision and development must be generally in accordance with the density, distribution and diversity targets set in Plan 3 Housing Plan and Table 3 Housing Density and Diversity to the satisfaction of the responsible authority. Residential subdivision and development that can demonstrate how target densities can be achieved over time may be considered.	Residential subdivision and development should be generally in accordance with the density, distribution and diversity targets set in Plan 3 Housing Plan and Table 3 Housing Density and Diversity to the satisfaction of the responsible authority. Residential subdivision and development that can demonstrate how target densities can be achieved over time may be considered.
R5	Lots must front waterways, connector streets and open space (including local parks and easements), unless the lot abuts a bushfire hazard setback area shown on Plan 7 Bushfire Plan or otherwise agreed to by the responsible authority.	Lots should front waterways, connector streets and open space (including local parks and easements), unless the lot abuts a bushfire hazard setback area shown on Plan 7 Bushfire Plan or otherwise agreed to by the responsible authority.
R8	All roads must be designed and constructed generally in accordance with Plan 4 Movement Network Plan, and relevant cross sections in Appendix 5 Standard road cross sections and functional layout plans, unless otherwise agreed by the relevant authority	All roads should be designed and constructed generally in accordance with Plan 4 Movement Network Plan, and relevant cross sections in Appendix 5 Standard road cross sections and functional layout plans, unless otherwise agreed by the relevant authority

Appendix 1: Concept Plan

Melbourne

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The concept plan illustrates the proposed development layout. Key features include:

- Conservation Area (2.35Ha):** Shaded in light green at the top right.
- School Site (3.5Ha):** A large orange-shaded rectangular area on the left side.
- Community Facility (1Ha):** A yellow-green shaded area adjacent to the School Site.
- Residential Lots:** Numerous small white-outlined plots are arranged along roads, many with numerical dimensions (e.g., 24, 33, 40.51, 46.52, 44.06, 33.47, 33.90, 35.72, 38.99, 24, 16m, 21, 34.06, 46.31, 28.27, 28.54, 16m, 28, 14.5, 21, 25, 24, 16m, 16m, 28, 25m, 16m, 28, 102.23, 104.23, 85.45, 24, 16, 91, 24, 8, 24, 16, 25, 28, 28.86, 27.87, 28.7, 571, 24, 8, 24, 16m, 28).
- Road Network:** Indicated by solid and dashed lines.
- Topography:** Represented by brown contour lines.
- Orientation:** A north arrow pointing upwards is located in the bottom right corner, labeled "N MGA2020 Zone 55".


**PRELIMINARY COPY
FOR DISCUSSION**

**SYNERGY LIVING DEVELOPMENT P/L
1072-1114 BEATTYS ROAD
GRANGEFIELDS
MELTON COUNCIL
REF: 1688_CPC_Rev C
CONCEPT PLAN**

SYNERGY LIVING DEVELOPMENT P/L
1072-1114 BEATTYS ROAD
GRANGEFIELDS
MELTON COUNCIL
REF: 1688_CPC_Rev C
CONCEPT PLAN

SCALE 1:1000 at A1

10 0 20 40 60m



This plan cannot be manipulated without the written consent of Charlton Degg Pty Ltd. Use of this information is limited to the agreed scope and brief between the client and Charlton Degg Pty Ltd.

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