



11 April 2025

Genna Walkley
Strategic Planning Manager – West Team
Victorian Planning Authority
Via MeltonEast.vpa.vic.gov.au

Dear Genna Walkley,

**RE: Melton East Precinct Structure Plan Consultation
Property 13 – 1967–1987 Melton Highway, Grangefields**

Town Planning People act on behalf of the landowner of Property 13, Sandra Green, in relation to this submission. We submit in regards to the consultation period of draft Planning Scheme Amendment C244melt, noting an extension has been provided to the landowner until 11th April to make a submission.

This submission is made in conjunction with the attached Memo prepared by Water Studio, dated 11 April 2025.



Figure 1 – Excerpt of the PSP Framework (March 2025), with the site outlined in red.



Property 13 – Draft PSP March 2025

Property 13, addressed as 1967–1987 Melton Highway Grangefields, is an oddly shaped lot of 10.47 ha, located within the north-east portion of the PSP. The site is accessed via Melton Highway, and the properties eastern boundary is to Kororoit Creek. The site does not benefit from existing constructed access to Judd Court (however benefits from a battleaxe handle boundary to Judd Court), and is accessed via Melton Highway only.

The 10.47ha site is currently proposed to be heavily encumbered by conservation areas (5.37ha), waterway and drainage reserve (4.08ha), and a portion of a local park LP-05 (0.35ha). This results in a 0.68ha of net developable area. This is a significant reduction in NDA compared to previous draft versions of the PSP.

Summary of Concerns

The draft PSP results in a number of concerns for Property 13, which are summarised below:

- Having no independent access to allow for independent development, relying on adjoining property owners to purchase Property 13 and its current constraints and unknowns or be subject to the timing of adjacent property developers.
- Having three separated areas of 'NDA', albeit all being undevelopable in their own right
- Being subject to a significant drainage reserve setback of 30m from the escarpment which provides no drainage function, resulting in the 'main' net developable area being an estimated ~34m x ~170m at its widest points (as advised by the VPA).
- The ~34m² deep net developable area is in turn impacted by a required 20.5m road reserve (Local Access Street Residential – Conservation Area Interface incorporating a 19.0m fuel reduction area), resulting in an unworkable remaining lot depth of ~13.5m²
- Having the ~34m² main developable area (at its widest point) be subject to a significant patch of vegetation that "must" be retained (whilst the Arborist Report identifies the patch of estimated 50 trees was viewed from the street frontage only, and we note the patch extends 200m and includes vegetation not visible/assessable from the frontage)
- Being subject to a poorly located local park that traverses property boundaries, resulting in a known issue of complicated delivery. The park is not located to retain any specific vegetation identified to be retained, and results in additional access and sequencing issues for the site.

These areas of concern are explored in greater detail.

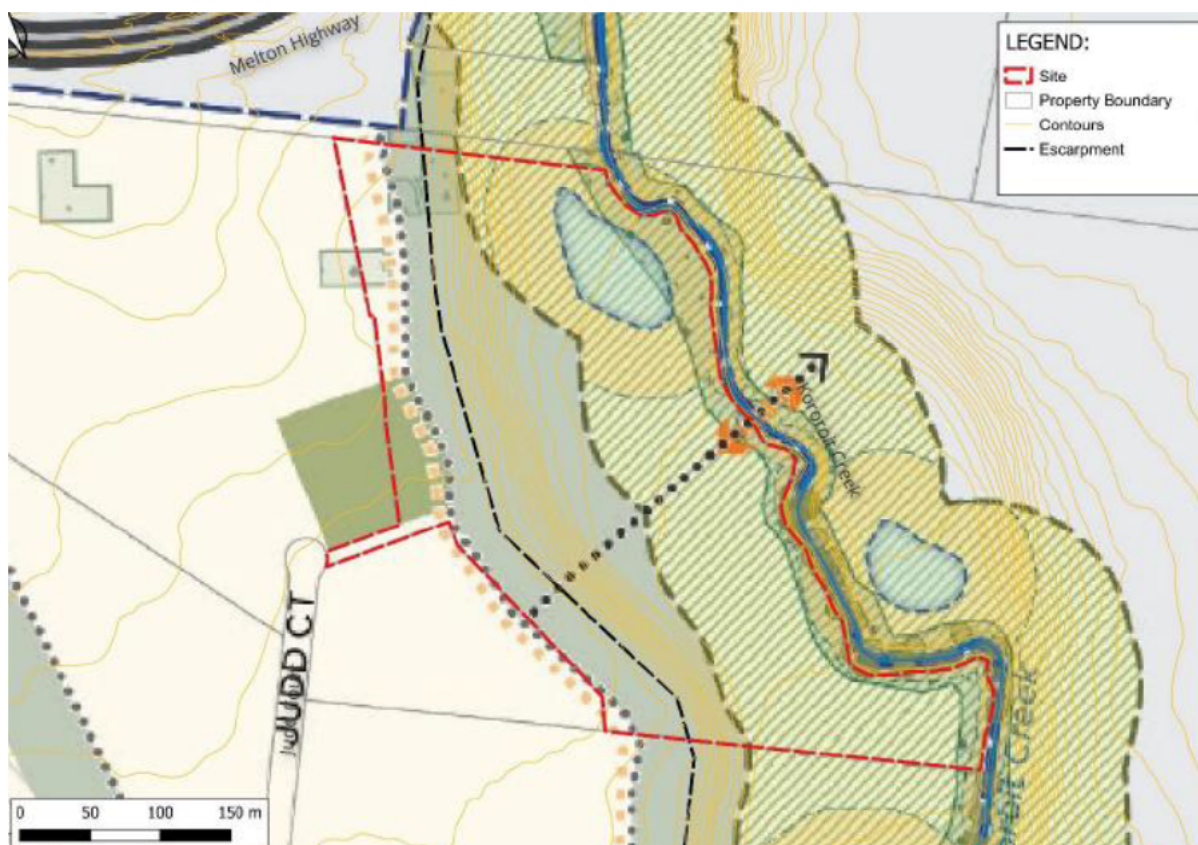


Figure 2 - The draft PSP March 2025 outcome for Property 13 (Water Studio, April 2025)

Access constraints

With no ultimate access from Melton Highway, Property 13 has no constructed access to Judd Court. Interim access from Judd Court, if allowed, services a thin area of the NDA only, with the main northern portion separated by the drainage reserve and local park and southern portion also inaccessible.

The draft PSP makes the main northern NDA area of Property 13 solely reliant on Property 12 for access to develop, whilst also relies on Property 17 or 20 to develop or purchase the small southern triangle of NDA due to access constraints.

NDA Areas

The site has three distinct areas of NDA, all undevelopable in their own right.

Figure 1 PSP Performance Summary identifies a minimum dwelling density of 30 dwellings per NDA in standard amenity areas, and 27 dwellings per NDA in other areas. The entirety of the NDA of the site is subject to standard amenity areas. However, it is queried if this target can be met due to the resulting constraints of the draft PSP.

The ~34 x ~170m **northern portion** of NDA is landlocked and reliant on Property 12 for access, resulting in a PSP framework that does not allow independent subdivision and development of Property 13. In turn, this restricts implementation and delivery of the PSP.

The ~34m² wide net developable area is in turn impacted by a required 20.5m road reserve (Local Access Street Residential – Conservation Area Interface incorporating a 19.0m fuel reduction area), resulting in an unworkable independent remaining lot depth of ~13.5m² at its widest point. Further, the It is noted the existing dwelling conflicts with the required road reserve interface.

Local Access Street residential – Conservation Area Interface

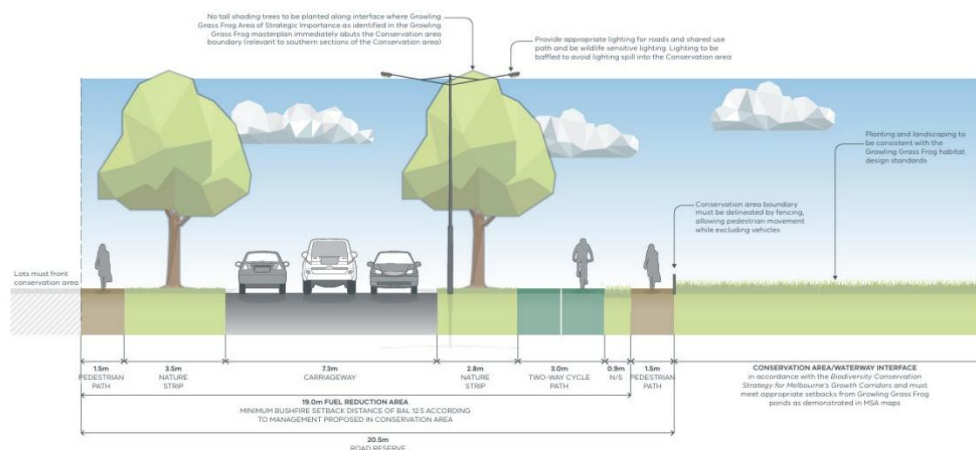


Figure 3 - Interface road required to the drainage reserve, as identified in the draft PSP March 2025.

We also seek confirmation and clarity that the two-way cycle paths and pedestrian paths as shown in this cross section are the “offroad shared path” and “off-road Two-Way Bike Path” as shown in Figure 4 Conservation Area Concept Plan.

Additionally, this ~34m² wide NDA area is subject to a significant patch of vegetation that “must” be retained. We note that the Arborist Report prepared by Tree Logic identifies Group as an assorted mix of planted native and exotic trees as “not accessed, viewed from the front.” The number of trees, height, health and structures of individual trees has not been assessed but is estimated, however this severely restricts development opportunity.



Figure 4 – Group 29 on Property 13 (Tree Logic 2022)



We also query the bushfire hazard setback. R5 identifies that *"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."* We note this should read Plan 9.

However R52 identifies that *"development and subdivision must provide for a perimeter road or alternative bushfire interface."* Plan 9 identifies the site is subject to a Bushfire Hazard Area A (19m). It appears the PSP seeks for a perimeter road for fuel reduction, yet suggests lots must not front waterways due to the bushfire hazard setback.

In short, the land dimensions and constraints of access, buffer roads and vegetation results in NDA which is not independently developable.

The **Central Portion** of NDA is associated with the 10m wide battleaxe handle (unconstructed) access point to Judd Court

This portion of land is not independently developable, and requires Property 17 to purchase/develop.

The **Southern Portion** of NDA is a small triangle in the south-west corner of Property 13, which also requires Property 17 pr 2- to purchase/develop.

In short, no area of NDA is able to be independently developed due to access constraints, location of the local park, extent of drainage reserves or required buffer roads. All areas require the good faith of other property developers.

Drainage

As identified within the Memo prepared by Water Studio, the site is subject to a general 30m drainage reserve setback from the top of the escarpment which provides no drainage function or responds to any hydraulic need. In addition, it appears Melbourne Water have identified that built form setbacks can reduced to 30m along Kororoit Creek.

It is submitted that the 30m buffer from the top of the escarpment is excessive and not required. This *"other uncredited open space"* does not appear to be utilised for any drainage assets and is not required for any hydraulic reasons, yet is not reimbursable.

We submit that the Local Access Street Residential – Conservation Area Interface (or amended to include a slightly wider nature strip to the escarpment) should border the escarpment, or be 30m should read from the top of the hydraulic water level.

This would allow an appropriate shift of the bicycle lanes/paths and perimeter road near to the escarpment, whilst continuing to provide high levels of amenity, habitat improvements appropriate reserves and open space, and appropriate bushfire safety outcomes.

The shift allows for a NDA that allows Property 13 to develop independently (whilst still likely requiring Property 12 to be developed first for access). Reduction in the 30m drainage reserve allows the required perimeter road to be constructed and generally allowing for one

row of housing to be constructed (indicatively shown as ~28m deep lots) independently within Property 13 (notwithstanding remaining issues regarding required vegetation).

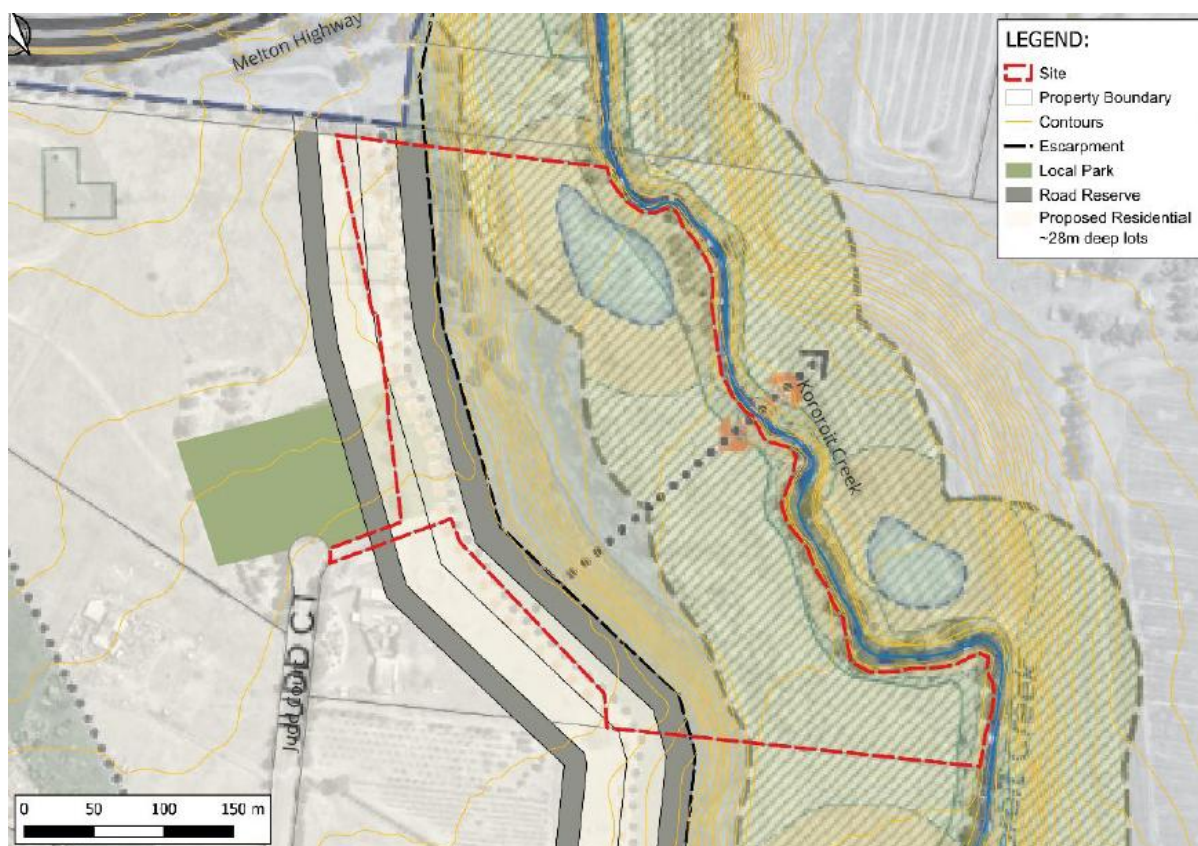


Figure 5 – A reduction in the 30m uncredited drainage reserve allows for Property 13 to develop independently.

Local Park

The draft placement of LP-05 results in fundamental issues for Property 13.

Firstly, it is appreciated that Local Parks may generally be located in well connected areas, adjacent to community uses and activity centres or adjacent to reserves. However, 'standalone' open space can also be considered (ie LP-12).

However, it is the experience of this office that parks (or any designated community facility or open space) should be wholly located within a singular lot to allow for easy delivery.

LP-05 is located across property boundaries with Property 12, further complicating and convoluting access for Property 13 and delivery of the park. Further, the location of the park is not to retain vegetation and there appears no reason as to why the park must be located in the draft location. The forced connection to the drainage reserve results in fundamental flaws for the delivery of development to Property 13.



Figure 6 - Trees to be retained on Property 12 (or 13) are outside of the location of the park (PSP, March 2025)

There are various locations within the immediate vicinity for the park to be relocated to better allow for the independent development of Property 13 and single landowner delivery of the park, all whilst still ensuring the catchment still has appropriate access to local parks.

Whether it be a 'stand alone' park or adjacent to reserves, wholly locating the park within Property 12, 16, 17 or 20 makes most sense whilst still allowing all future residents of the north-east corner of the PSP to access the park. Further, consideration should be given to locating the park with direct access/views to the off-road shared path associated with the pedestrian bridge, which would see the park shift to the south or relocating the park to the west over the tree to be retained on Property 12.

We appreciate "generally in accordance" applies for future applications for subdivision, however this is significantly restricted when parks straddle multiple properties. It appears there is no specific need or requirement for the park to be located here, and the location as proposed results in various concerns.

If you have any queries regarding this submission, please do not hesitate to contact me.

Kind regards,