

Amendment C244melt – Melton East PSP

Melbourne Water Submission – Additional Comments Table

Item No.	Reference	Topic	Change requested by MW	MW Comment (on public version of PSP)
1	Table 3 and Plan 2	Housing typologies	Regrading density in amenity areas. Amend to "Low to mid-rise developments should be prioritized around schools, the periphery of amenity areas, and adjoining Kororoit Creek, natural wetlands and conservation areas. "	<p>Low to mid-rise development should also be managed around wetlands and conservation areas. MW will be land manager of wetlands and in this case, we will be considering wetlands as part of the waterway system.</p> <p>Clause 12.03-1S (River and riparian corridors, waterways, lakes, wetlands and billabongs) of the Melton Planning Scheme supports minimisation of development views from wetland environs.</p> <p>Clause 12.03-1S also includes Melbourne Water's <i>Healthy Waterways Strategy</i> as a policy document.</p>
2	R24	Public Realm	<p>Request amended wording:</p> <p>"A landscape plan must specify tree species which are suitable to the local climate and soil conditions in accordance with the Melton City Council Plant List or other relevant landscaping and street tree policy, to the satisfaction of the responsible authority. Appropriate native species must be used along/in waterways and drainage reserves to the satisfaction of MW and the responsible authority."</p>	<p>MW would prefer reference to appropriate native species along waterway/drainage corridors. It is whether this is defined in the "Melton City Plant List", which could not be found online.</p>
3	R29	Public Realm	<p>Request amended wording:</p> <p>"Public paths or other infrastructure located within a BCS conservation area must be designed to avoid and minimize disturbance to native vegetation and habitat for matters of national and state environmental significance and be located in accordance with the BCS Conservation Area Concept Plans in Appendix 6 - to the satisfaction of DEECA, MW, responsible authority"</p>	<p>Public paths/shared trails in BCS should be to the satisfaction of DEECA, MW and the Responsible Authority.</p>
4	R37	Drainage waterways	<p>Request amended wording:</p> <p>"The final layout, boundaries and design of constructed wetlands, constructed waterways, pipes, retarding basins, stormwater treatment infrastructure, and associated paths, boardwalks, bridges, and planting, must..."</p>	<p>Include pipes and constructed waterways in listed items for sodic soil / erosion measures.</p>

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5	R39	Drainage waterways	Request amended wording: "Stormwater infrastructure within or adjacent to the BCS conservation area or retained wetlands (pre-European) must be designed to use treated stormwater to achieve the hydrological requirements of retained wetlands (pre-European) and Growling Grass Frog habitat wetlands, unless with the written approval of DEECA, Melbourne Water and the RA "	This requirement must be updated to require MW and RA approval where applicable. Currently only DEECA is referred to in Requirement R39 (page 39), however DEECA have no say on other pre-European wetlands (other than K3 (wetland near RB-06)) so MW and the Responsible Authority would require input to any changes.
6	G15	Public Realm	Request amended wording: "Vegetation identified in Plan 8 Native Vegetation Retention & Removal as 'can be removed' should be retained where possible along streets, drainage reserves area and in subdivisions, as identified in the Melton East PSP Arboriculture Report..."	Include drainage reserves in guidance.
7	Table 15	IWM	Request amended wording: "Incorporate indigenous cultural heritage (through wetlands and waterways) (WWWACHC, Melbourne Water, responsible authority and DEECA)"	For the 6th item. Strengthened community knowledge and local values reflected in place-based planning, the first dot point should include RA and DEECA (they will be future land managers/planners too) Council will generally be responsible for signage and community infrastructure.
8	Plan 7	Water Plan	Revisions to Plan 7 to provide appropriate designations for escarpment areas and flood prone land. Recommendations: - Plans that show current UFZ area, Escarpment area and natural wetland area; -Reword 'Waterways and Drainage' to include broader characterisation i.e. Waterways, drainage and existing encumbered land, which could include clarification of existing encumbered land 'UFZ/flood prone land, escarpments and pre-European wetlands or areas of cultural heritage values'. -Combination of the above approaches and inclusion of an existing constraints map which has UFZ, escarpment, pre-European wetland and cultural values areas. - Consider how similar matters were dealt with in Officer South PSP.	The 'waterways and drainage' designation is applied to land not required for DSS purposes, such as the escarpment setback areas on account of geotechnical and cultural heritage matters and land currently zoned UFZ. MW consider that this designation fails to convey the context, conditions and role of those areas. I.e. the escarpment setback relates to cultural heritage, environmental and geotechnical concerns (i.e. not necessarily drainage per se), and the UFZ land is flood prone. The 'waterways and drainage' designation also gives the impression that MW will be responsible for all such land, however there will also be areas which Council will be responsible for, or areas that remain in private ownership.
9	Plan 7	Water Plan	Plan 7 requires review of DSS assets naming and location along with associated Table 14.	The plan and associated table are now superseded and do not accurately reflect the asset type nor the correct areas that have been presented in the Alluvium report. Melbourne Water recommends the plan and table to reflect the most up to date information post Public Consultation submission responses.
10	Cross Section Taylors Rd	Bushfire	Delete the following wording from the cross section: "This cross section can be varied where appropriate adjacent to waterways and conservation areas. The local frontage may not be required "	It is not necessary to state that local frontage may not be required. MW (and DEECA for conservation area) position is that road interface to reserves is preferred, which is also supported through bushfire set back requirements. There may be opportunities for case-by-case which is already accounted for in MW proposed new Guideline in High Quality Public Realm and existing Requirement R52 (page 31) relating to Bushfire.
11	App. 6 Table 28	Conservation Area concept notes	Note 4. Include MW as conservation area is on waterway and has active floodplain.	<i>"Any proposed development or works within the Conservation Area requires the approval of the DEECA and Melbourne Water"</i>

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12	App. 6 Table 28	Conservation Area concept notes	Note 8. include wording, where feasible.	"Off road shared path and two-way bike paths are to continue underneath the bridges where feasible. "
13	App 8 Plan 16	Utilities plan	Representation of different utilities looks messy; MW proposed drainage is draining to empty property spots, perhaps would be good to show the land asset locations for clarity on where the pipelines connected to.	MW proposed utilities need to be updated on Plan 16 (page 96) to reflect the latest DSS pipelines, given they currently reflect previous DSS pipeline alignments.
14	Plan 3	Housing	Aintree Town Centre (Rockbank North PSP) hatch shows encroachment into the Kororoit Creek Flood Plain. This should be amended to be consistent with current Urban Framework information from council.	No additional comment.
15	Plan 4	Movement Network	Shared path connectivity utilizing waterway corridors. This provides connectivity to green spaces and potentially land-take efficiency in future waterway corridor design, and path requirements.	<p>The movement and network plan lacks key connectivity between green corridors and amenity areas.</p> <p>Refer to Appendix 1, which comprises a plan which MW has marked up to identify suggested connections which utilise waterway corridors in pink.</p> <p>This provides connectivity to green spaces and potentially land-take efficiency in future waterway corridor design, and path requirements.</p>

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16	Plan 12	Infrastructure and Development Staging	The way staging has been communicated in the PSP needs to be reviewed and also updated to present critical outfalls to facilitate development.	<p>The Staging Plan (Plan 12) does not guide drainage delivery/staging. The plan should feature the 3 main outfalls - being the most critical drainage staging components. Additionally, MW considers that there should be a drainage specific delivery requirement and guideline to replace R63. This should draw on the drafting from the closing day version (SAC) Croskell EPSP.</p> <p><u>Croskell closing day SAC EPSP version</u> <i>Requirement:</i> <i>Prior to the issue of a statement of compliance for the first stage of the subdivision of a PSP parcel or completion of the first stage of the development of a PSP parcel, all Development Services Scheme (DSS) assets identified for that PSP parcel within the:</i></p> <ul style="list-style-type: none"> • <i>Plan 11 Infrastructure and development staging;</i> • <i>Table 19 Infrastructure coordination requirements – parcels</i> <p><i>must be delivered. Where it can be demonstrated that this is not reasonably practicable, with the written consent of the responsible authority and Melbourne Water, a development may rely on:</i></p> <ul style="list-style-type: none"> • <i>The staged delivery of the assets identified for that PSP parcel; or</i> • <i>A proposal for interim drainage solutions for one or more stages; or</i> • <i>The delivery of the assets identified for that PSP parcel at a later stage of the subdivision or development.</i> <p><i>Guideline:</i> <i>Proposals for the staged delivery of the assets identified for that PSP parcel, interim drainage solutions, or the delivery of the assets identified for that PSP parcel at a later stage, may be considered by the responsible authority and Melbourne Water, provided this is submitted in writing and demonstrates:</i></p> <ul style="list-style-type: none"> • <i>The basis for not providing the ultimate assets prior to the issue of a statement of compliance for the first stage of the subdivision of the PSP parcel or completion of the first stage of the development of the PSP parcel.</i> • <i>How any interim or staged drainage solution will satisfactorily manage flow rates and treat stormwater generated from the development without causing adverse impacts to the other properties within or outside the precinct, the environment, cultural heritage, groundwater, or other infrastructure.</i> • <i>No risk to the ultimate delivery of drainage assets.</i> • <i>No additional costs to the DSS arising from providing the interim or staged drainage solution.</i> • <i>The ultimate asset will be delivered prior to the issue of a statement of compliance for the final stage or the completion of development of the PSP parcel.</i> <p>Also refer to AV Evaluation Comments (Item 16).</p>
17	Table 23.	Precinct infrastructure	In the description, provide the number of lanes required for the proposed bridges.	The 'Description' column for Table 23 should be amended to provide the number of lanes required for the proposed bridges (page 62). This is critical for culvert design and to outline how hydraulics will work and be staged. It will also determine or otherwise guide the extent of works within the floodplain.
18	Table 13 SR-03B Table 23 references to SR-03B, SR-03A	Precinct infrastructure - Regional Sports	For the regional active open space, the PSP should provide more specific references about the flooding for SR-03B. Also confirm if this regional open space area is still being connected to an open space parcel in Warrensbrook PSP. If so, this should be mentioned in the PSP as it will be good context for Leakes Road future implementation.	Table more objectives and context for the Regional Active Open space which is encumbered by flooding.

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19	Plan 7, Table 14	Water Plan	Amend Plan 7	Plan 7 should be amended to identify which DSS asset types are shown on the plan (symbols to reflect e.g. Pipe, RB, waterway) and an accompanying table listing DSS asset items. Alternatively (for simplification) Plan 7 should show only drainage reserve areas. Additional changes are also sought (see Item 8) to correctly identify waterway and drainage areas, versus land which is encumbered for other reasons.
20	Plan 7	Drainage	<p>The PSP has only provided enough land take for the wetland (not the waterway). More land take is required to fit both WLRB5 (RB-06 on Plan 7) and the waterway (located between WLRB5 and GGF), as outlined below.</p> <p>Additional land take is required for the waterway on the west side of the GGF conservation area. This extra land take should be added to the drainage land take on the north-west side of the WLRB5 (RB-06 on Plan 7) with the same width (that was removed). Additional land take is required from property 42 shown on Plan 14.</p> <p>MW has a low flow channel that was removed on the latest drainage land take which needs to be shown. The land area that is provided on the PSP can only fit the wetland and there is no space for the waterway.</p>	<p>An additional land take on Plan 7 is required for the waterway on the west side of the GGF conservation area so that the bypass channel can be located in this area.</p> <p>This extra land take should be added to the drainage land take on the north west side of WLRB5 (RB-06 on Plan 7) with the same width (that was removed on the latest drainage land take in PSP) - as a consequence, additional land take is required from property 42 shown on Plan 14).</p>

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21	Plan 7	Drainage	The PSP does not reflect the shapefiles provided from MW to the VPA. More Drainage land take needs to be shown for: RB-01, RB-02, RB-04 and RB-14 (referring to Plan 7).	<p>Some land take shown on Plan 7 is not in alignment with the shapefiles provided by MW, with the following discrepancies:</p> <p>RB-01: The drainage land take is undersized. The drainage land take needs to be reflected based on the latest DSS, more specifically additional land take is required on the east side of the drainage asset and also to reflect the latest road alignment. The additional land take will be required from property 3 on Plan 14.</p> <p>RB-02: The drainage land take is undersized. The drainage land take needs to be reflected based on the latest DSS; more specifically additional land take is required on the west side of the drainage asset. The additional land take will be required from property 9 on Plan 14.</p> <p>RB-04: The drainage land take is undersized. The drainage land take needs to be reflected based on the latest DSS; more specifically additional land take is required on the north side of the drainage asset. The additional land take will be required from property 26 on Plan 14.</p> <p>RB-14: The drainage land take is undersized. The drainage land take needs to be reflected based on the latest DSS; more specifically additional land take is required on the west side of RB-14. The additional land take will be required from property 75 on Plan 14. We note that according to plan 10, a potential rise area is also located on this land and MW might require more drainage land take to accommodate the stoney rise location.</p> <p>MW also notes that further refinements to the DSS are likely post-public consultation, including possibly as a result of applying the new climate change guidelines.</p>
22	Plan 7	Drainage	Reducing the land take for the waterway from K3 (GGF conservation area) to K4. Waterway Corridor in this location is 45m (based on the Stormwater Management Strategy Report) but a 55m waterway corridor is reflected in the PSP land take. By aligning the waterway next to Beattys Rd, less land take would be required.	The land take for the waterway from K3 (GGF conservation area) to K4 could be reduced. By aligning the waterway adjacent to Beattys Road, with the required corridor of 45m (based on the Stormwater Management Strategy Report), less land take would be required.
23	Plan 12 & Plan 13	Drainage	All of the culverts within the PSP be included on the plan.	Plan 12 & Plan 13 to be updated to reflect the latest culvert alignments
24	Plan 12	Drainage	Leakes Rd Culverts including CU-03, CU-04, CU-05, CU-06 should be classified as Stage 1. Culverts should be constructed with the road upgrade.	Plan 12 to be updated to reflect the correct staging for Leakes Rd culverts.
25	3.2 Safe accessible well connected	Public Realm	Amend wording of G7 regarding 30% canopy tree coverage: add "(excluding areas dedicated to biodiversity, native vegetation conservation and drainage assets)" .	Canopy tree coverage requirements should exclude conservation and biodiversity areas, and drainage assets. This is consistent with Officer South, and Croskell PSP (as drafted in closing day SAC version).
26	High quality public realm - Objectives	Drainage	Add 'stormwater management' specific objective. E.g. To ensure stormwater is managed for flood protection factoring in climate change and water quality treatment etc	A stormwater management specific objective is appropriate to relate to the stormwater and drainage related PSP requirements and Plan 7. This is consistent with Croskell PSP (as drafted in closing day SAC version).

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27	R33	Cultural heritage	Add to R33: <i>"Where possible, harm should be avoided and/or minimised to any identified Aboriginal cultural heritage values."</i>	To promote harm minimisation, consistent with Croskell PSP (as drafted in closing day SAC version).
28	High quality public realm - Guidelines	DSS Interface	Add guideline for separation of development from DSS: "Subdivision should provide for a local street separating development from development services scheme assets, waterways, sporting reserves, utility easements and local parks. Where subdivision does not propose a local street separating development, design and layout options should demonstrate: a) Lots directly fronting open space and landscape value areas should be set back at least 4.5 metres b) Lots directly fronting open space should allow for vehicular access via a rear laneway c) A 4 metre wide access way should be provided as the primary point of access from a footpath or shared path with a minimum width of 1.5 metres along the lot frontage d) Subdivision design should avoid side or rear fence treatments fronting open space and development services scheme assets e) Subdivision design should maximise opportunities for informal passive surveillance f) Subdivision design should not limit the use of adjacent open space. to the satisfaction of the responsible authority and in relation to DSS assets and waterways, Melbourne Water"	MW's preference is for perimeter roads separating private development land from drainage related land/assets/waterways. A similar guideline has been used in other PSPs, including Croskell.
29	Plan 9	Bushfire	Plan 9 legend/designation: "bushfire hazard area A/B" should be changed to "bushfire hazard interface 19m/48m" or "bushfire setback 19m/48m" .	The "Bushfire hazard area" designation gives the impression that it shows the location of the actual hazard. However, it actually shows the interface or defendable space requirement. The wording (and associated requirements/guidelines) should be amended to reflect this.

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30	R51	Bushfire	Revise wording: "The vegetation within the bushfire hazard areas shown on Plan 9 Bushfire (other than land vested in or under the control or management of, a municipal council and public authority) , must be managed to a level that ensures it does not result in an AS 3959 vegetation class that would require a greater 'separation distance' than that specified in Plan 9, unless otherwise agreed to in writing by the fire authority and responsible authority "	These revisions are sought for clarity and to ensure the PSP does not provide a different obligation to that imposed by section 5 of the Fire Rescue Victoria Act 1958.
31	R52 and Plan 9	Bushfire	Reword the first part of R52 "Development and subdivision must provide for a perimeter road or alternative bushfire interface for the entire width of the corresponding bushfire hazard area identified on Plan 9 Bushfire, to the satisfaction of the responsible authority & relevant fire authority, and where the bushfire hazard area is drainage and waterway land, to the satisfaction of Melbourne Water. "	To ensure that a perimeter road/alternative (where adjoining drainage and waterway land) is to MW's satisfaction.
32	R78	Drainage	Amend R78 as follows: Stormwater runoff from development must meet the performance objectives of the Commonwealth Scientific and Industrial Research Organisation Best Practice Environmental Management Guidelines for Urban Stormwater (or as amended), and urban stormwater management guidance (EPA's publication 1739) , prior to discharge to receiving waterways and as outlined in Plan 7 Public realm and water, unless otherwise approved by Melbourne Water and the responsible authority. Proposals that exceed the performance objectives are highly encouraged and can be considered, all to the satisfaction of Melbourne Water and the responsible authority.	Include reference to EPA publication.

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33	Subdivision application requirement	Drainage	<p>Amend the stormwater application requirement as follows:</p> <p>"A Stormwater Management Plan, that assesses the existing surface and subsurface drainage conditions on the site, addresses the provision, staging and timing of stormwater drainage works required to service the land and/or by the DSS or PSP, including any proposed temporary outfall provisions, to the satisfaction of Melton City Council and Melbourne Water."</p>	To convey that temporary outfall provisions can be applied for but are not necessarily supported.
34	Application requirement - Integrated Water Management	IWM	<p>Amend the IWM application requirement as follows:</p> <p>"An application to subdivide land must be accompanied by an Integrated Water Management Plan. This plan must include IWM initiatives to reduce reliance on potable water and increase the utilisation of storm and recycled water, and contribute to a sustainable urban environment. It must have regard to relevant water management policies and strategies implemented by the responsible authority. The IWM Plan must have a focus on drainage servicing, that assesses the existing surface and subsurface drainage conditions on the site, addresses the provision, staging and timing of stormwater drainage works, including temporary outfall provisions, flow rate and flow volume management, to the satisfaction of Melton City Council and Melbourne Water."</p>	To make IWM requirement more comprehensive/complete.
35	Application requirements - bushfire management plan	Bushfire	<p>Delete the 6th and 7th dot point.</p> <p>And Amend the 5th bullet point to clarify that it relates to private land:</p> <ul style="list-style-type: none">• "The details of any vegetation management in any area of defendable space on private land including, information on how vegetation will be managed and when the vegetation management will occur i.e. annually, quarterly, during the fire danger period;"	The 6th and 7th bullet point relate to public land management, and this is not regulated by any permit but by the obligations of authorities under the Fire Rescue Victoria Act 1958. It is therefore not appropriate for a development permit to attempt to regulate the ongoing management of public land by Council, water authorities and electricity suppliers.

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36	Mandatory condition	Drainage	<p>Condition – Integrated water management plan</p> <p>A permit to subdivide land, or to construct a building or carry out works, must include the following condition: Unless otherwise agreed by the Responsible Authority and Melbourne Water, before certification of the plan of subdivision the Stormwater Management Plan and Integrated Water Management Plan must be endorsed by the Responsible Authority.</p>	Regarding the potential for development to occur without subdivision, and to include Stormwater Management Plan (as per application requirement) as well as IWM Plan.
37	Mandatory referral	Drainage	Amend the schedule to clause 66.04 to provide for referral of significant development applications for industry, retail or business under the UGZ13 to Melbourne Water as a determining referral authority.	MW is a mandatory referral authority for subdivision, however not for development. There is a significant risk to MW that 'development only' (or development prior to subdivision) applications will not be referred to MW and the opportunity missed for delivery of required drainage, DSS contributions, and works offers.
38	R45	Post-contact Heritage Requirements	Any subdivision and/or development of land adjoining a heritage site identified under <i>State Heritage Listing</i> , the Heritage Overlay in the Melton Planning Scheme and/or of post-contact cultural heritage significance must have regard to the heritage significance of the site and provide a sensitive interface.	Include 'State Heritage Listing' since there is a State listed Victorian Heritage Inventory listed place within the PSP area: H7822-2301 (BEATTYS ROAD BLUESTONE COTTAGE AND CISTERN).
39	G32	Aboriginal Cultural Heritage Guidelines	Where a Cultural Heritage Management Plan is required, it should include recommendations provision for the ongoing preservation, restoration, management and maintenance of waterways and water landscapes as part of the CHMP activity description . Any such ongoing management and maintenance requirements should be considered for inclusion as an appropriately worded condition on a relevant planning permit.	CHMP can't include recommendations - needs to be part of the CHMP activity description to be enforceable
40	G33	Aboriginal Cultural Heritage Guidelines	A voluntary Cultural Heritage Management Plan should be undertaken in the following locations if a 'high impact activity' is undertaken, as defined in Division 5 of the Aboriginal Heritage Regulations 2018.	Guideline G33 re-worded, as existing drafting could be interpreted as requiring a voluntary CHMP.

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41	G34	Aboriginal Cultural Heritage Guidelines	Development should recognise and respond to Aboriginal Cultural Heritage significance through: <i>Add: Facilitating harm avoidance and/or minimisation to Aboriginal cultural heritage values where possible, by relocating or redesigning development.</i>	MW supports an approach which seeks harm avoidance/minimisation, rather than relying on developer utilising salvage
42	Plan 6	Public Realm	Map shows Heritage Overlay, consider also including Victorian Heritage Inventory listed place	Include State listed Victorian Heritage Inventory listed place within the PSP area: H7822-2301 (BEATTYS ROAD BLUESTONE COTTAGE AND CISTERN).
43	Plan 7	Drainage	A new Climate Change sensitivity analysis has to be completed based on the new Climate Change guideline to ensure the peak flood levels are consistent with the drainage footprints. This guideline was only recently released with a number of Shared Socioeconomic Pathways (SSPs) as climate change scenarios (from very low to very high) and in the absence of industry guidance on which SSP scenario should be incorporated. Therefore, in the future, Melbourne Water may need to undertake the sensitivity analysis considering more severe SSPs which may affect the drainage land take.	Melbourne Water is in the process of re-modelling its climate change risk scenario, and sensitivity testing is being undertaken in respect of the Drainage Strategy, which is expected to be finalised shortly. This work will ensure that the peak flood levels are consistent with the drainage footprints. <i>Australian Rainfall and Runoff Guidelines (Version 4.2)</i> were only recently released with a number of Shared Socioeconomic Pathways (SSPs) as climate change scenarios (from very low to very high). MW will be undertaking a sensitivity analysis (due before the end of the financial year) considering SSPs which may affect the drainage land take.
44	Plan 7	Drainage	Due to the latest road alignment, less drainage land take may be required on the south side of K4 (between the waterway and RB-08)	Less drainage land take may be required on the south side of K4 (between the waterway and RB-08), due to the latest road alignment.

APPENDIX 1

MW Mark-Up of Plan 4 – Connectivity Plan

