

A Vibrant, Safe and Liveable
City Accessible to All



Melton City Council Submission

Melton East Precinct Structure Plan and Infrastructure
Contributions Plan

Melton City Council

April 2025

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A. Conditional Support for Amendment.

The Amendment is strategically justified however as the Implementing Authority, there are important changes required to the Amendment before the City of Melton (Council) is able to support the progression of the Amendment.

Despite the concerns raised in the submission, Council recognises the important role that the Melton growth corridor to provide an opportunity for families to gain access to affordable housing and to provide for employment creation which have a positive flow on effect to Melbourne and to the State as a whole and in relation to economic development and improvements to the provision of major infrastructure and services throughout the wider growth corridor.

B. Drainage Services Scheme Changes

The following Drainage Services Scheme (DSS) and consequential PSP-related changes should be made to the Amendment.

Submission B1 – Explore Opportunities to Reduce the Impact of Pre-European Wetlands on the Net Developable Area (NDA).

The impact of the retention of pre-European Wetlands on the urban structure, infrastructure costs and net developable area (NDA) are significant. Opportunities to reduce the impact should be considered, where relevant objectives can be met and appropriate changes should be adopted before the Amendment is approved.

Figure 1 is an extract from the PSP land budget table. The table indicates that the conservation, waterways and drainage reserves will comprise about 273 hectares. This is over a square mile of land and as such is a very significant area.

Figure 1: Extract from PSP Land Budget Table

UNCREDITED OPEN SPACE & REGIONAL OPEN SPACE			
Conservation Reserve (BCS)	91.68	9.12%	18.27%
Heritage	1.84	0.18%	0.37%
Waterway and Drainage Reserve	181.27	18.03%	36.12%
SUB-TOTAL UNCREDITED OPEN SPACE & REGIONAL OPEN SPACE	274.78	27.34%	54.75%
CREDITED OPEN SPACE			
Local Network Park (ICP land)	11.85	1.18%	2.36%
Local Sports Reserve (ICP land)	26.00	2.59%	5.18%
Regional Sports Reserve (ICP land)	15.00	1.49%	2.99%
SUB-TOTAL CREDITED OPEN SPACE	52.85	5.26%	10.53%
TOTAL ALL OPEN SPACE	327.63	32.60%	65.28%

These areas are driving down the NDA to a record low 49%. This is the first PSP to have an NDA below 50% and one of few to have an NDA below 60%.

Given this, opportunities to increase the developable area should be explored. A key driver of the large green infrastructure in the PSP are the Pre-European Wetlands. The extent of retention should be subject to a strategic and independent review.

Some of the implications of these large areas being retained are:

- The residential neighbourhoods are not well integrated and connected.

- The cost to the State, Council and developers to extend services and road networks past these large green spaces are significant.
- Development is inefficient and costly to deliver.
- The Supplementary Levy and the DSS levies are driven higher.

Submission B2 – Confirmation of Future Land Management.

Given that over 273 hectares will be set aside for green infrastructure, Council seeks written assurance that the State that it will own and manage the Pre-European Wetlands and associated drainage infrastructure.

Council does not have the resources or capability to manage such large and complex ecological and cultural water management spaces over time.

The PSP should be amended, for example in the Precinct Infrastructure Plan to designate the future public land owner and manager for each part of the green infrastructure network.

Consideration should be given to how these areas move into public ownership, given their scale, for those areas that are not vested in the State through the development process. Some property owners may choose to leave the land in private ownership, creating issues with long term management and retention of the ecological values and in terms of an integrated green space network.

Submission B3 - Maximise Recreation Opportunities Associated with the Large Areas of Encumbered Land.

Given the extensive areas designated for Green Infrastructure, the State should consider the space as a regional park for the wider Melton Community.

Council submits that the State should prepare a high-level concept plan for the parklands that allows for integration of recreation opportunities throughout the area including shared paths, seating, picnic areas as well as walking tracks, lookouts and boardwalks. This high level plan should be included in the final PSP to express the vision for the future of the space and to show the value the space can provide to the community over time.

Submission B4 – Explore Opportunities to Reduce the Area Required for Drainage Infrastructure.

Opportunities to reduce the impact of drainage on the NDA should be considered, where relevant objectives can be met and where appropriate changes adopted.

The approach to the overall drainage strategy should seek to minimise the land required (subject to satisfaction of other performance outcomes), which could otherwise be NDA. The siting of drainage assets within the conservation areas should also be considered where the conservation values are not compromised. The siting of passive recreation infrastructure within these areas should also be considered.

The VPA is requested to work with MWC and DEECA to explore opportunities for removal of drainage land, including consideration of opportunities such as:

- Whether wetlands can be co-located with other encumbered land to increase NDA.
- Whether there is scope for any of the major wetlands to be on line systems, rather than off line. This would require adopting non standard approaches to allow water movement through the wetland such that plant health and wetland performances standards can still be met. If achieved, significant land area saving could be found.
- Whether the land takes shown are overlay conservative and whether additional NDA can be shown before the PSP is approved.
- Whether sections of waterways, particularly those near green infrastructure, can have their width reduced while still meeting policy and performance requirements.

Submission B5 – Proactive DSS Implementation Facilitation.

Given the importance of the delivery of drainage infrastructure to support the PSP staging, a deliberate approach to facilitation of drainage works should be adopted by Melbourne Water. The types of approaches that should be considered by Melbourne Water include:

- Applying a Public Acquisition Overlay (PAO) to secure the land for key drainage assets and land to achieve a free draining asset. If this cannot be achieved as part of the current Amendment, a separate future Amendment should be progressed to achieve this.
- Amending the PSP to include reference to s36 of the Subdivision Act to facilitate, where appropriate, the private acquisition of land for easements to facilitate drainage works construction.

Early acquisition of land through a PAO will allow for Cultural Heritage Management Plans (CHMPs) to be prepared, geotechnical investigations and functional designs to be advanced. This enables and de-risks delivery of the assets and provides options for delivery of capital works by either MWC or a development proponent. It is important that MWC support the delivery of assets through funding from the DSS to reimburse developers for design development and delivery – especially where assets will service a number of individual estates.

The PSP should be amended to incorporate provisions that enable developers to acquire drainage easements under s36 of the Subdivision Act. The Provisions of s36 provide as follows (our **highlight**):

*“If when considering a proposed amendment to a planning scheme or an application for a permit or to amend a permit; or in implementing an amendment to a planning scheme; or in a condition in a permit the **Council or a referral authority states in writing** that it considers that **the economical and efficient subdivision** or consolidation (whether existing or proposed) or servicing of, or access to, land covered by planning proposal requires the owner of land to remove a right of way over the owner's land; or acquire or remove an easement over other land in the subdivision or consolidation; or other land in the vicinity and that the removal or acquisition **will not result in an unreasonable loss of amenity** in the area affected by the removal or acquisition, the owner may apply to the Victorian Civil and Administrative Tribunal for leave to remove the right of way or acquire or remove the easement compulsorily.*

In conferring powers on a Council or referral authority it is the intention of Parliament that, in considering a matter for the purposes of that subsection, the Council or referral authority should make an assessment of the engineering and amenity aspects of the matter, is not bound to notify anyone affected or to hear objections, but objections to that assessment may be raised before the Tribunal.

The Tribunal may give leave subject to any conditions it thinks fit. If leave is given in accordance with any conditions to which the leave is subject, the owner may compulsorily acquire the easement and the Land Acquisition and Compensation Act 1986 applies to the acquirement of the easement, and for that purpose this section is the special Act and the owner is the Authority; or in accordance with any conditions to which leave is subject, the owner may submit for certification and lodge for registration a plan to remove the easement and unless the Tribunal otherwise directs, the consent of any person having an interest in land benefited by the easement is not required for its removal.”

In summary s36 provides:

- If Council or MWC states in writing that it considers that the economical and efficient subdivision, servicing or access to land covered by planning proposal requires the owner of land to acquire an easement over other land in the vicinity and that the removal or acquisition will not result in an unreasonable loss of amenity, then the owner may apply to the Victorian Civil and Administrative Tribunal (VCAT) for leave to compulsorily acquire the easement or right of way.
- The landowner can then use the provisions of the Land Acquisition and Compensation Act (LACA) to compulsorily acquire the easement or right of way.
- If confirmed by VCAT, the impacted landowner is entitled to compensation, however they can not block the acquisition of the easement.

The process to acquire land under section 36 is complex and involves multiple hearings, through different VCAT jurisdictions. For example, a process could progress as follows:

- Applicant seeks a permit or statement from Council, or a referral authority concerning s36 (see s40(2));
- If the statement or permit is declined, this decision can be reviewed at VCAT (Planning List);
- Once statement or permit is obtained, action is started at VCAT to acquire (Real Property List);
- Once leave is granted, compensation is assessed at VCAT (Valuation List).

The VPA is requested to work with MWC to include a suitable statement in the relevant part of the PSP to the effect that, for the purposes of s36 of the Subdivision Action, that MWC considers that the economical and efficient subdivision of the or servicing of the land may require an easement to deliver permanent drainage assets or outfalls to meet the staging obligations of the PSP. And that MWC or Council will consider individual acquisitions on their merits proposed by landowners as to whether they will result in an unreasonable loss of amenity to the impacted landowner.

Submission B5 – Other DSS Changes.

Submission B5a

PSP R42 – Requires developers to achieve infiltration targets in Melbourne Water's Healthy Waterway Strategy (2018). Council requests VPA and MWC advice to confirm whether this requirement has been considered and applied in the DSS and if so, to what standard. If this has not been considered, then the VPA and MWC are requested to include guidance in the PSP regarding how this can be achieved due to the high targets set in the Strategy.

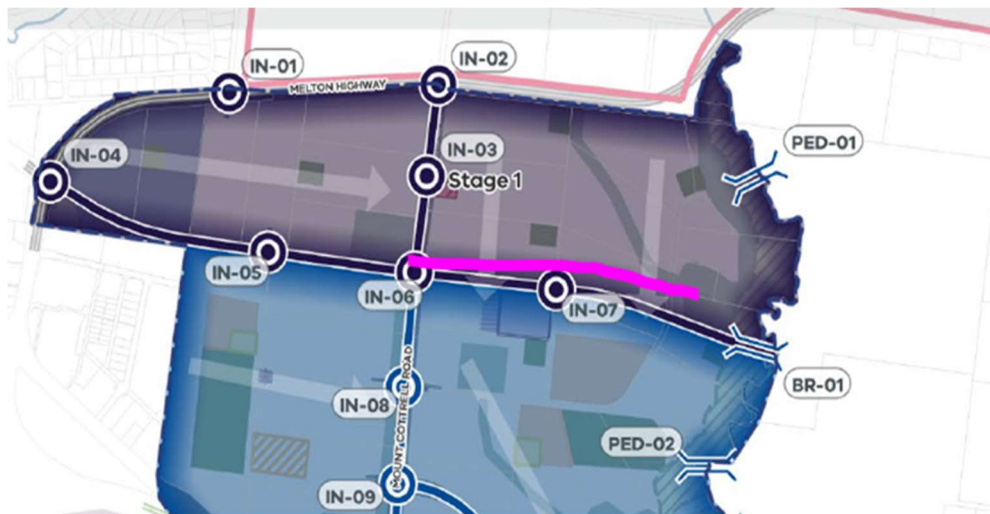
Submission B5b

In relation to G18, Council does not support street swales and raingardens due high maintenance. There is also a potential for blockages by the future residents. Council requests the alteration of G18 as follows:

The design and layout of roads, road reserves, and public open space should optimise water use efficiency and long-term viability of vegetation, tree canopy and public uses to contribute to a sustainable and green urban environment. This should be achieved using overland flow paths, passive watering, and Water Sensitive Urban Design initiatives such as street swales, rain gardens and/or locally treated storm water for irrigation.

Submission B5c

PSP Plan 12 – Northern Stage 1 is dependent on the drainage infrastructure within Stage 2. As such, it is suggested MW to investigate possibility of directing the Stage 1 catchment west of Mt Cottrell Road to east as indicated below.



C. PSP Plan Changes.

The following changes to the PSP plans should be made before the Amendment is approved.

Submission C1 – Urban Design Improvements.

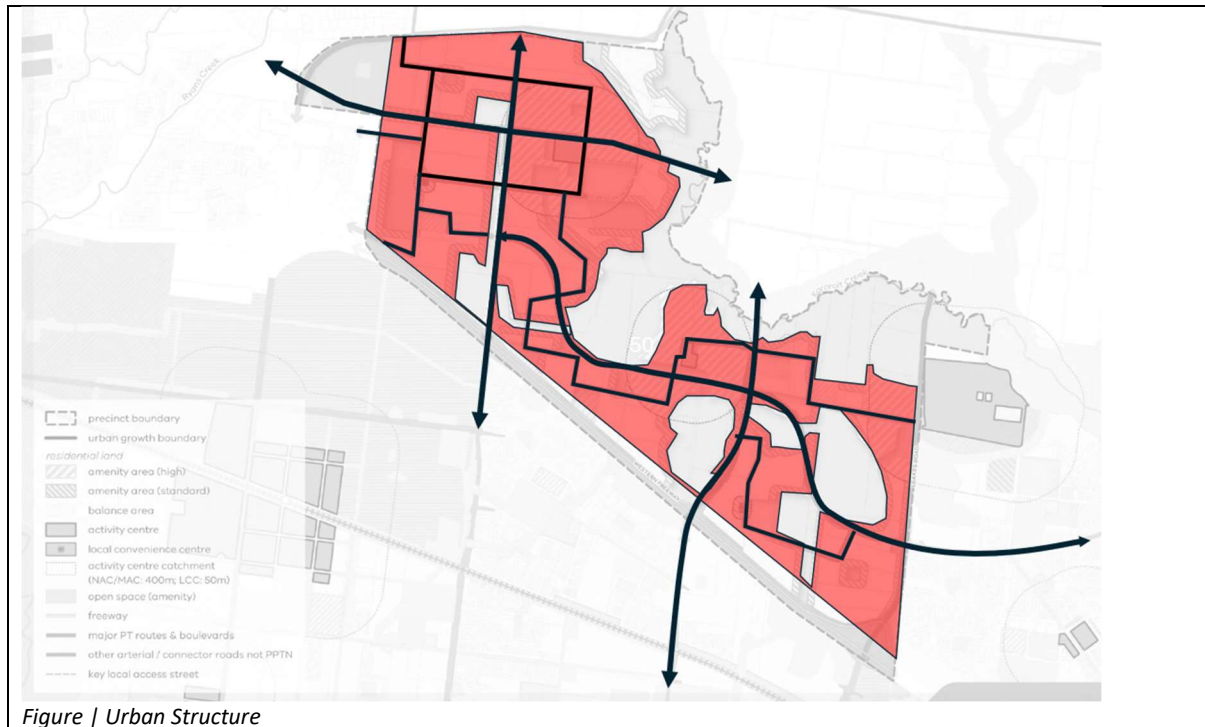
The urban structure should be refined to improve urban design and community design outcomes at the strategic and granular level.

Council submits that the draft urban structure:

- Is not sufficiently legible and does not maximise the creation of distinctive neighbourhoods.
- Does not sufficiently create logical focal points and places of interest shaped by site features and topography.
- In certain areas, creates a convoluted road layout and does not logically connect adjacent neighbourhoods.
- Leaves pockets of undevelopable land parcels.
- Applies higher density housing according to a formula around 'high amenity' areas where a more nuanced approach is required.

The urban structure appears to be driven by an objective to use existing road corridors. While commendable, this does not always result in a legible outcome. The plan creates issues that will be difficult to resolve at the permit stage.

Higher densities should be primarily focused around larger town centres and arterial roads that can perform a strong road based public transport function as set out in the Growth Corridor Plan with several additions designed to support high capacity public transport to be provided to link the residential population to heavy rail services.



It is submitted that the VPA should establish clear, organizing elements to guide the design of distinct neighbourhoods that are connected by a logical road layout with densities focused around arterial roads and neighbourhood centres.

The following organising elements are provided to the VPA for consideration and to re-organise the PSP place based future urban structure plan.

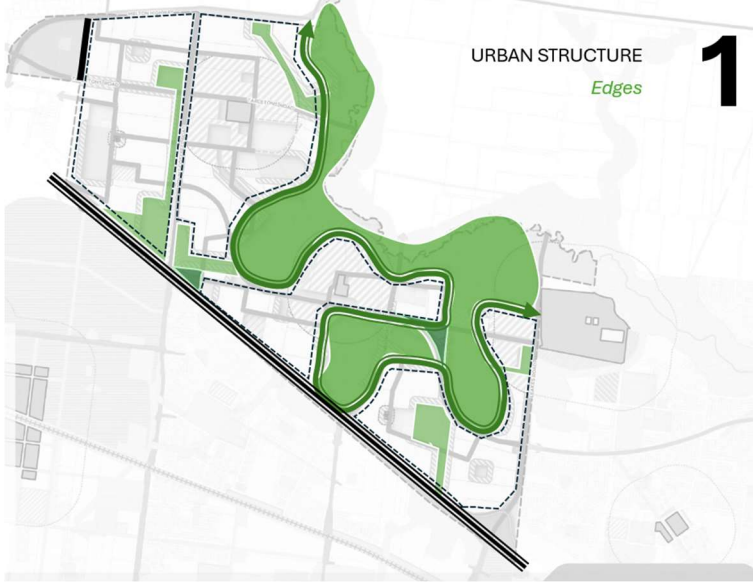
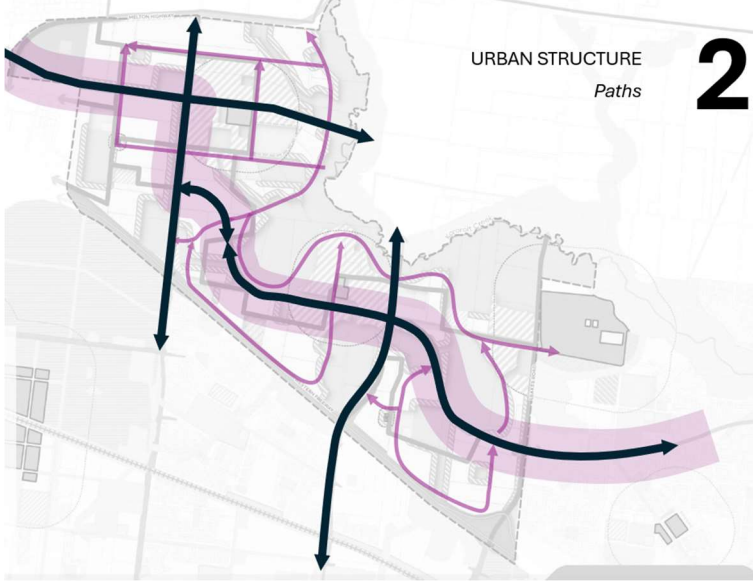
 <p>URBAN STRUCTURE Edges</p> <p>1</p>	<p>Create an Edge</p> <ul style="list-style-type: none"> • Re-shape wetlands to create realistic, feasible and economic pockets of developable area. • Define distinct building typologies to respond to both natural as well as Road Edges. • Allow for public access to wetland edges. • Allow for strategic cycling / pedestrian corridor along this defining edge
 <p>URBAN STRUCTURE Paths</p> <p>2</p>	<p>Create a Path that Connects</p> <ul style="list-style-type: none"> • Allow the Arterial Road to become the main spine to facilitate transport but also to connect people, allow for a typology to frame the wide road, allow for mixed use and higher densities, allow for convenient and efficient Public Transport that is built in from day one. • Realign Connector Road Network with the topography and site features and honour natural edges. • Avoid 90-degree angles on Connector Road alignment • Connector Roads to connect Districts and connect into Arterial Roads

Figure 1 | Edges

Figure 2 | Paths

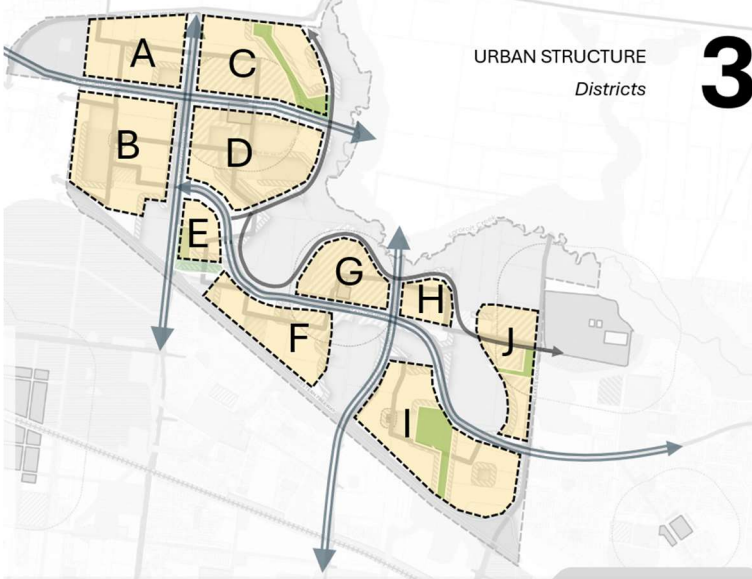
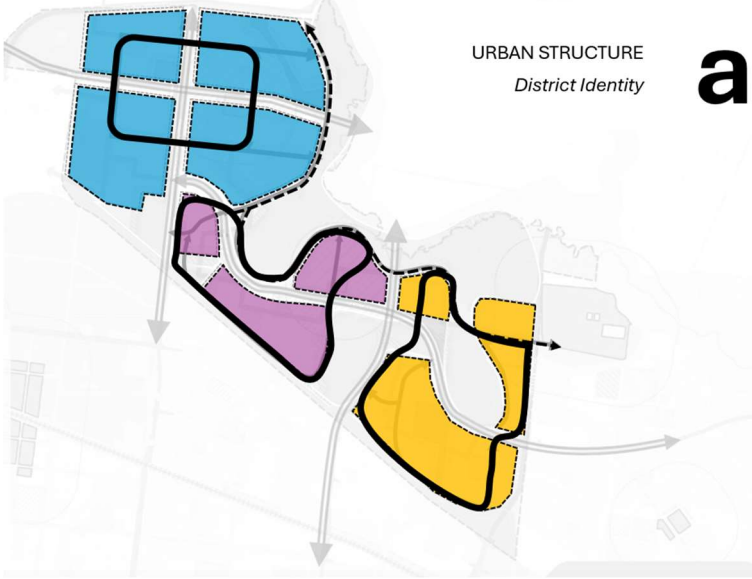
 <p>URBAN STRUCTURE Districts</p> <p>3</p>	<h3>Create Distinct Neighbourhoods</h3> <ul style="list-style-type: none"> • <i>Accept edges as barriers and create distinct precincts within its barriers</i> • <i>Establish district character</i> • <i>Base design / road network decisions on individual characteristics and constraints and opportunities.</i> • <i>Provide most districts with its own nodes</i> • <i>Provide each district with its own self sustainable, interconnected road network.</i> • <i>Inter-connect neighbourhoods (shared paths, bicycles, connector roads)</i>
 <p>URBAN STRUCTURE District Identity</p> <p>a</p>	<h3>Create Connected Neighbourhoods</h3> <ul style="list-style-type: none"> • <i>Logical Connector Road network to connect neighbourhoods</i> • <i>Connector Road to follow natural features rather than existing road reserve</i> • <i>Consider view angles onto wetland reserve for orientation.</i> • <i>Allow for direct and convenient connections between neighbourhoods to avoid reliance on cars.</i>

Figure 3 | Districts

Figure 3a | Connected Districts

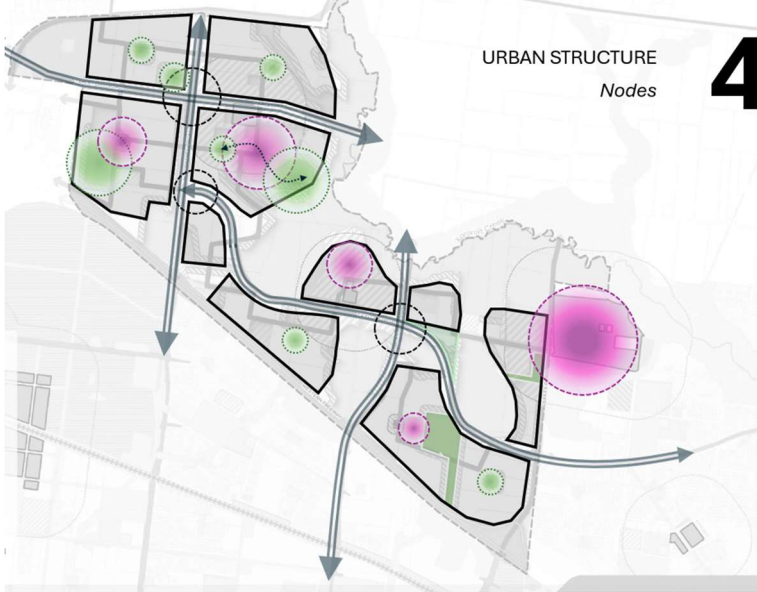
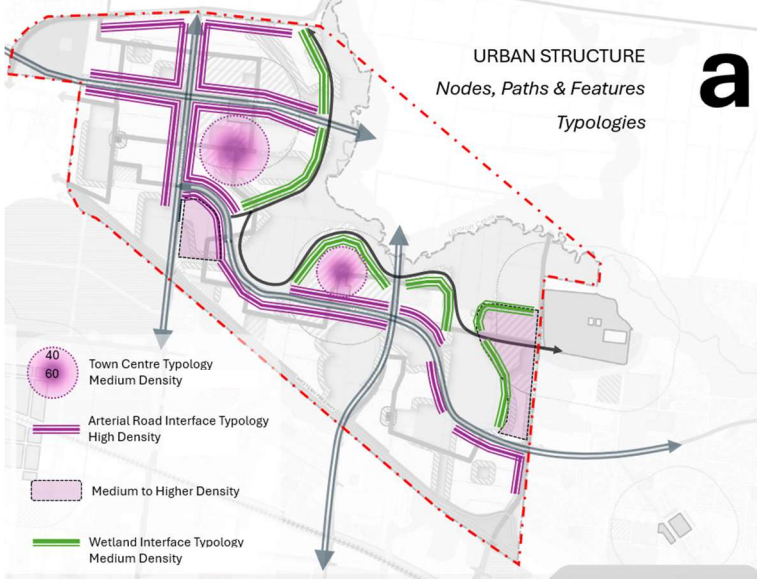
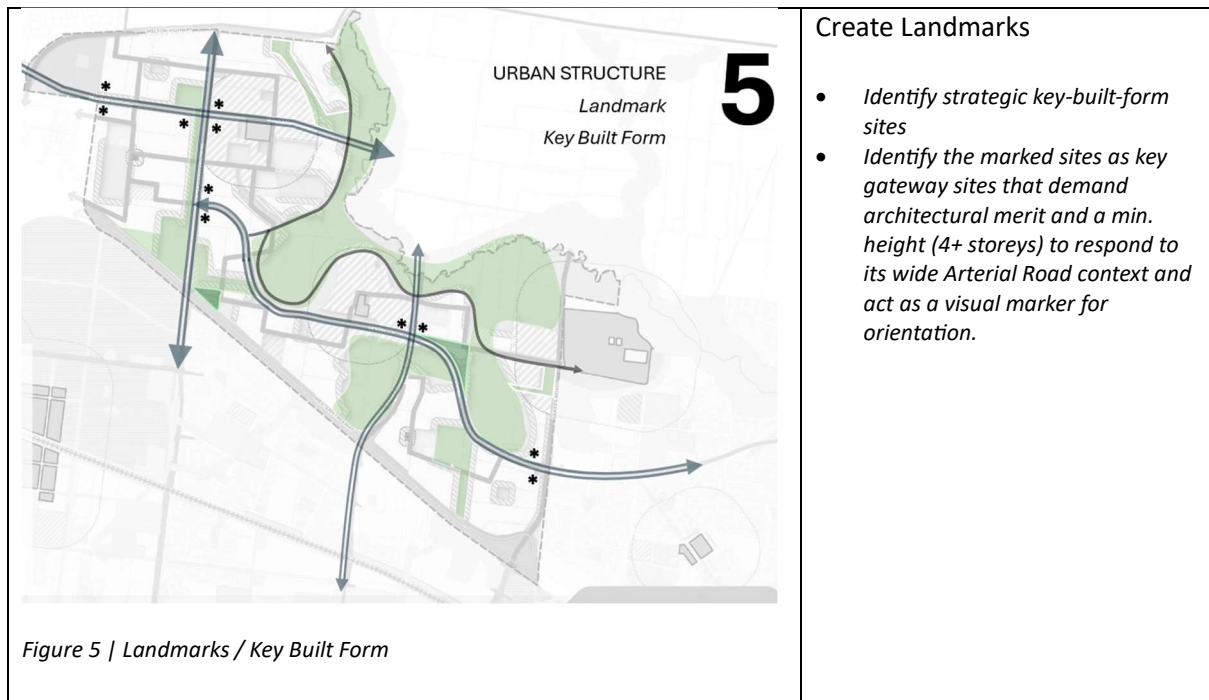
 <p>URBAN STRUCTURE Nodes</p> <p>4</p>	<h3>Create Nodes</h3> <ul style="list-style-type: none"> • Locate town centres central to a neighbourhood, where possible • Allow co-location of services that rely on carparking • Establish requirement for co-locating of carparks • Establish requirements for maximum number of carparks rather than minimums • Locate town centres away from Arterial Roads • Locate schools away from Connector Roads • Consider access / view lines to the green spine from the town centres • Siting of services to consider multi-purpose trips and accessibility by public transport.
 <p>URBAN STRUCTURE Nodes, Paths & Features Typologies</p> <p>a</p> <ul style="list-style-type: none"> 40 60 Town Centre Typology Medium Density Arterial Road Interface Typology High Density Medium to Higher Density Wetland Interface Typology Medium Density 	<h3>Establish Typologies in response to Urban Structure</h3> <ul style="list-style-type: none"> • Allow the 'right' density to respond to its context and further strengthen the urban structure • Allow for high density and medium rise buildings along the main corridor and <u>strongly frame</u> these <u>wide roads</u>. • Locate the highest density along Arterial Roads that can provide access to convenient public transport and bike infrastructure • Rather than a scattered approach to density, use a variety of typologies that respond to its context. • Town Centres to very strongly encourage shop top housing by mandating a suitable density. • The wetland interface requires a typology that can be as dense as 40dw/ha but must appropriately respond to this interface. • Various typologies to shape the urban structure and naturally provide housing diversity.

Figure 4 | Nodes

Figure 4a | Typologies



Submission C2 – Transport Network and Diagram Changes.

Submission C2a

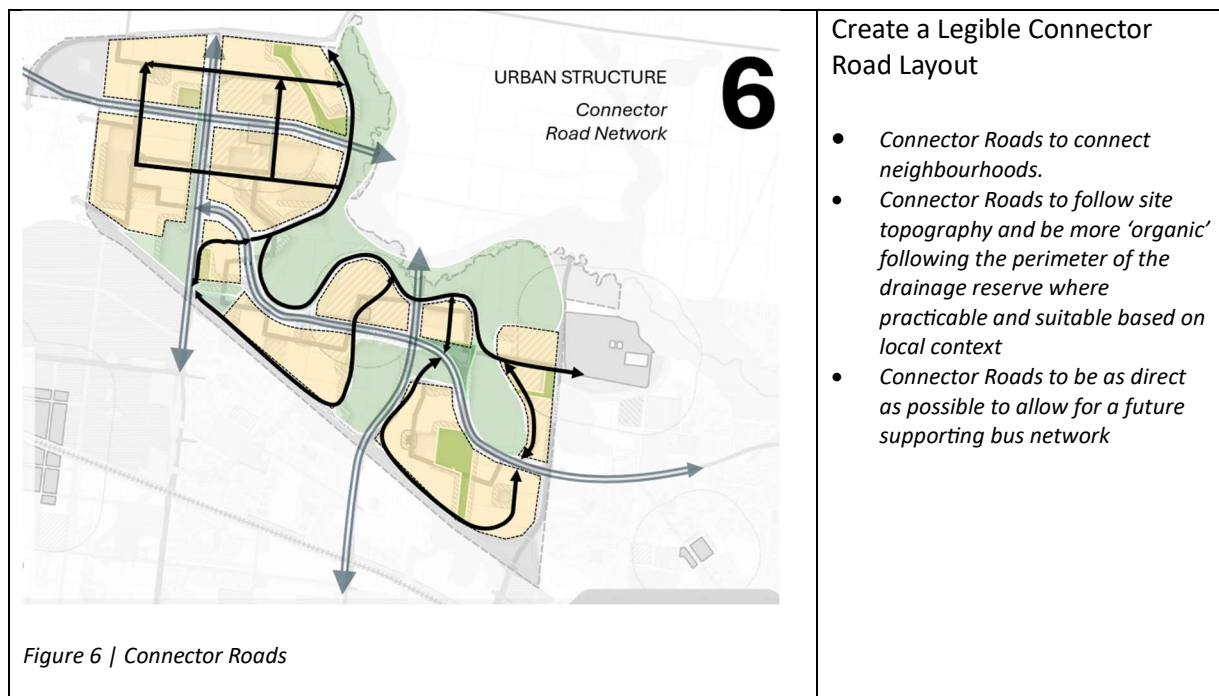
Practical changes as outlined below should be made to the street network and sections.

Given the broad ranging nature of this part of Council's submission, it is suggested that a workshop be held with the VPA to review the elements below and confirm and agree on changes that can be made now to address this submission.

The street network is not sufficiently site responsive for the following reasons:

- Some connector road segments are angular and will likely require specialized intersection treatments which may impact active transport.
- The road layout leads to slithers of constrained developable land which are difficult successfully develop.
- The street networks dissects neighbourhoods, rather than connecting them.
- The road layout promotes a car dominated environment.
- Navigation between neighbourhoods and especially to town centres and schools should be direct and logical to encourage active transport.
- The road layout precludes efficient Public Transport provision.

It is submitted that the VPA should revise the future urban structure by adopting the following approach.



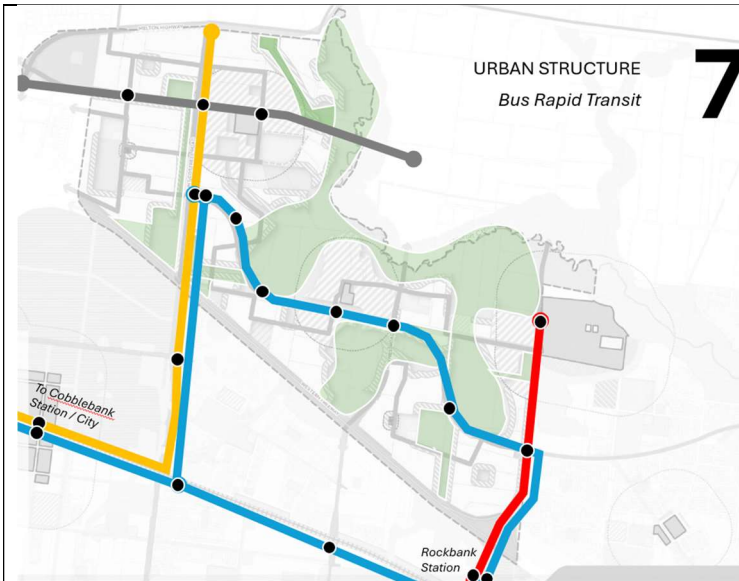


Figure 7 | Arterial Roads | Bus Rapid Transit

Built in Efficient Public Transport into Arterial Road Network

- Provide resilient and sustainable mobility from day one
- Revise section to include **dedicated** Bus Rapid Transport Lane (BRT)
- BRT to create a continuous loop around the precinct, alongside the arterial road network to deprioritize car dependency and allow access to the Cobblebank City Centre, Hospital, Schools and two train stations.
- The plan could begin with immediate, low-cost BRT implementation on arterial roads using temporary methods such as paint and plastic barriers.
- Over time, more significant improvements can be made to the BRT system's infrastructure.

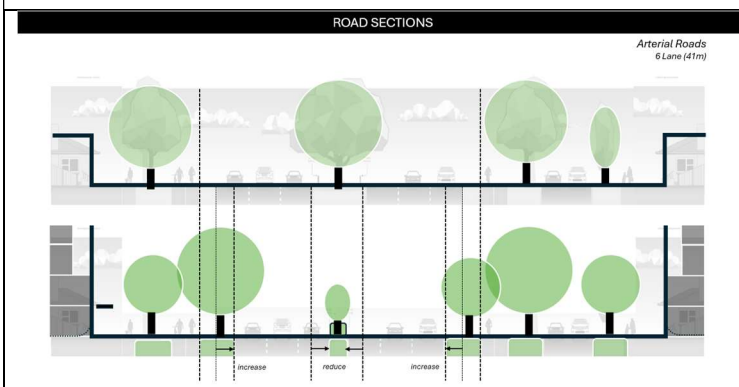
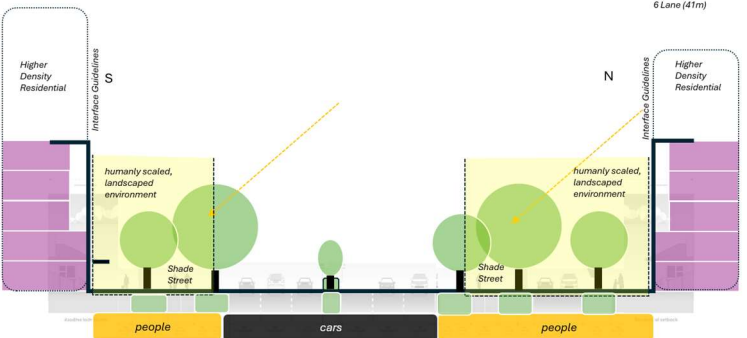
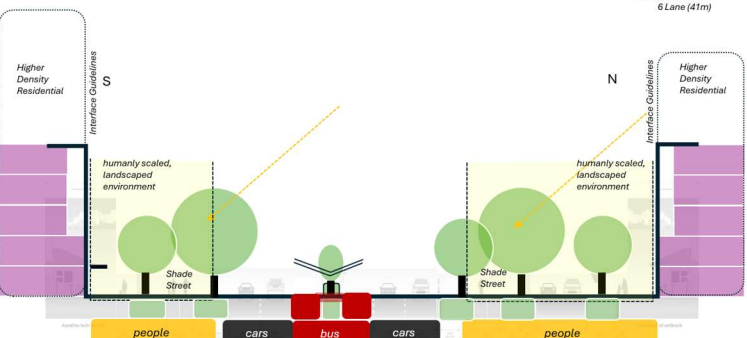


Figure 8 | Arterial Road Section

Arterial Road Section Human Scale

- Consider a more human centred, humanly scaled approach to the Arterial Road section.
- Reduce centre median from 6m to 2m as it will never be accessible or used by people
- Add 2m on each side of the shared paths to create a barrier between people and cars.
- This would provide a shade street effect whereas previously no protection was provided to the shared path network.

<p style="text-align: center;">ROAD SECTIONS</p>  <p style="text-align: right;">Arterial Roads 6 Lane (41m)</p> <p><i>Figure 9 Proposed Arterial Road Section</i></p>	<p>Arterial Road Section Establish People Zones</p> <ul style="list-style-type: none"> • Allow for higher density typologies to frame the Arterial Roads. • Create 'people' and 'traffic' zones. • Provide shade for people • Allow activation of the Arterial Road • Create a pleasant environment for people to walk as this is the most efficient, direct connection in the precinct
<p style="text-align: center;">ROAD SECTIONS</p>  <p style="text-align: right;">Arterial Roads 6 Lane (41m)</p> <p><i>Figure 10 Dedicated Bus Lane</i></p>	<p>Arterial Road Section Built-in Bus Rapid Transit</p> <ul style="list-style-type: none"> • To facilitate convenient public transport early in the life of the development, provide space for a dedicated Bus Rapid Transit Lane to connect the precinct with the two stations, hospitals, Cobblebank City Centre and schools.

The proposed approach builds on the Growth Corridor Plan as shown in Figure 2 below, with the red dashed line addition to connect the residential area to heavy rail.

Figure 2: Additional BRT PPT Route - Indicative

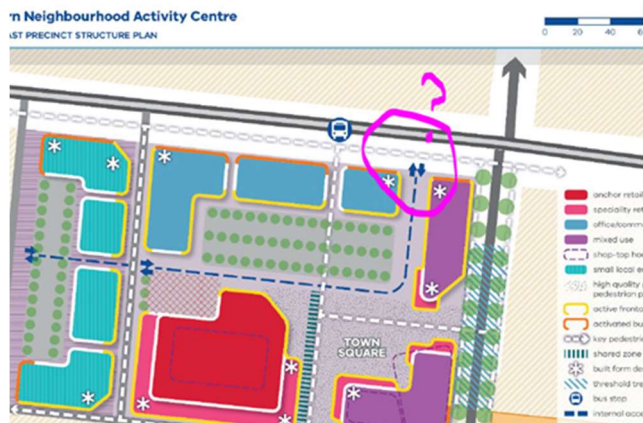


Submission C2b

The Secondary School does not have minimum 2 connector road frontages in accordance with the requirement R56. The PSP should be amended to comply with R56. It is suggested to include key local interface roads along the creek and reserves on Plan 4 to realise the requirement R56.

Submission C2c

Appendix 4 Figure 2 – Carpark access from Tarletons Road should be removed since Tarleton Rd is an Arterial Road and this access is undesirably close to a signalised intersection. Other access options exist that can provide suitable access.



Submission C2d

The modelling completed was based on incorrect road connections and only allowed for a population of 30,489 people. The PSP has shown an estimation of 40,014 population. This is a material difference that will generate trips in this PSP and cannot be used to justify the provided number of lanes proposed on the major arterial roads.

Table 10 PSP Land use assumptions (2051)

Zone	Population	Total Employment	Retail Employment	Primary Enrolments	Secondary Enrolments	Tertiary Enrolments
2607	938	0	0	0	0	0
2610	1,379	0	0	0	0	0
2615	1,138	126	101	0	0	0
2616	2,859	48	0	525	0	0
3395	1,918	30	0	525	0	0
3396	1,948	0	0	0	0	0
3397	2,283	48	0	525	0	0
3398	1,565	0	0	0	0	0
3399	2,188	0	0	0	0	0
3400	1,956	134	134	0	0	0
3401	731	577	0	0	0	0
3403	2,640	109	0	0	0	0

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AECOM

Melton East PSP – Strategic Transport Modelling

A-2

DRAFT

Zone	Population	Total Employment	Retail Employment	Primary Enrolments	Secondary Enrolments	Tertiary Enrolments
3404	3,619	0	0	0	0	0
3414	2,317	182	134	525	0	0
3422	0	0	0	0	0	0
3423	1,384	421	290	525	0	0
3424	294	37	0	0	1,200	0
3428	158	417	334	0	0	0
3429	581	0	0	0	0	0
3431	613	30	0	525	0	0
Total	30,489	2,159	30,489	30,489	30,489	30,489

Figure 1. PSP performance summary



Council submits that the traffic modelling must be revised and then re-issued to ensure the transport network is adequate to meet the demand travelling within and through this PSP. The PSP and ICP land budget and relevant drawings should be updated to reflect the outcome of the additional modelling before the PSP is approved.

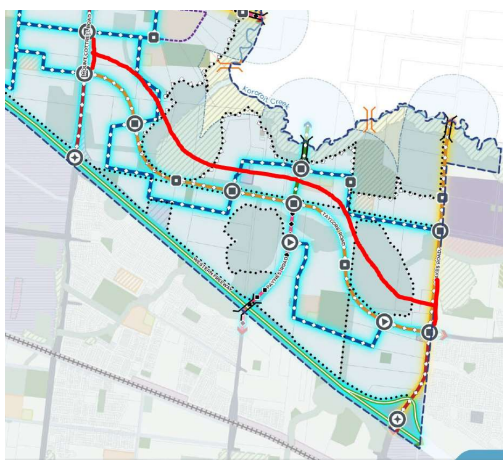
Pending further modelling, Council submits that Mount Cottrell Road should be 6 lanes from the Western Freeway to the Melton Highway, rather than stopping the 6 lane treatment at Tarletons Road



Pending further modelling, it is expected that Leakes Road should be 6 lanes from the Western Freeway to at least the northern intersection at Aintree Major Town Centre (RD-08 in Rockbank North PSP) to facilitate movement to this major activity generator, not stop at Taylors Road.



Pending further modelling, it is expected that Taylors Road between Mount Cottrell Road and Leakes Road should be 6 lanes.



Submission C2e

The number of turn lanes and treatment type (slip lane or standard turn lane) are generally in accordance with standards, however no analysis has been provided to determine if turn lane lengths are adequate for vehicle storage to prevent overflowing into through traffic.

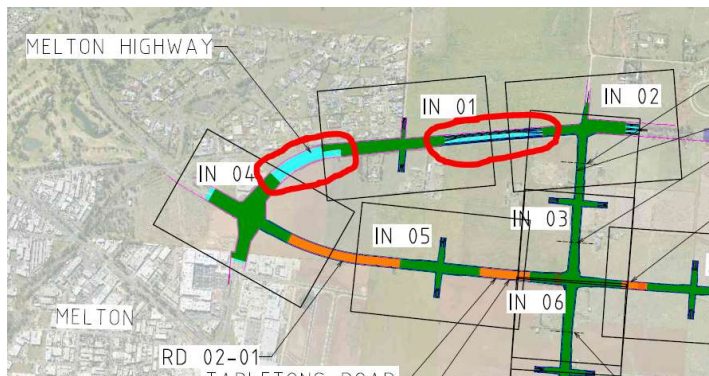
Council requests that the VPA provide traffic analysis to demonstrate that the turn lane lengths shown on the relevant PSP and ICP drawings are sufficient to meet requirements.

Council submits that the PSP and ICP land budgets and relevant drawings should be updated before the Amendment is approved to reflect the outcome of the further analysis.

If this work is not adequately undertaken, then Council will need to address turn lanes adequacy at the permit stage which will add time and complexity to the permit assessments. Further, it may lead to disputes with development proponents or may oppose extending turn lanes beyond the length shown in the PSP and ICP land and construction budgets.

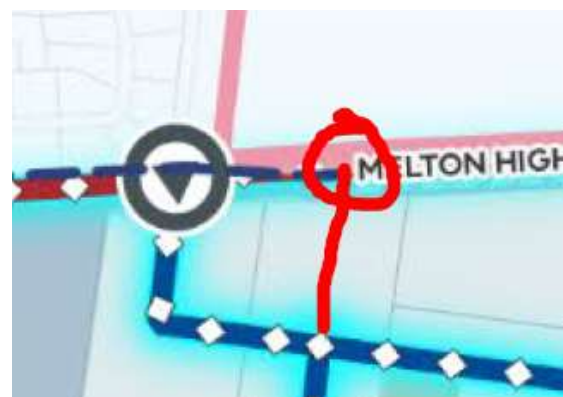
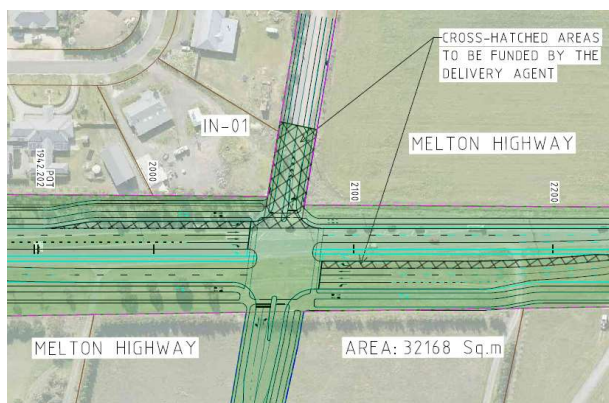
Submission C2f

IN-04, IN-01 and IN-02 are not connected in the ICP. Council submits that, the entire road between these intersections should be included in the ICP costings to ensure the delivery of the roads. The path network should be captured between the intersections.



Submission C2f

IN-01 - Southern leg should be changed so it is offset from Ryans Lane and Ryans Lane should be a left-in left-out treatment. There is no need to show further scope to be delivered by others.

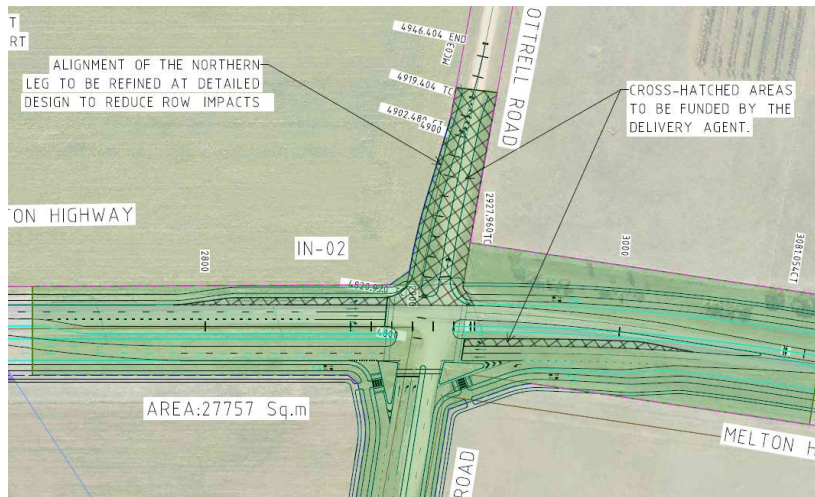


Submission C2g

IN-02 – Council does not support the northern leg not being captured in scope. How would existing residents and businesses such as the plant nursery to the north use this intersection safely?

The western leg should have 2 right turn lanes in the ultimate arrangement as per other arterial-arterial turning movements (refer to Plumpton PSP Hopkins Road/ Melton Highway intersection).

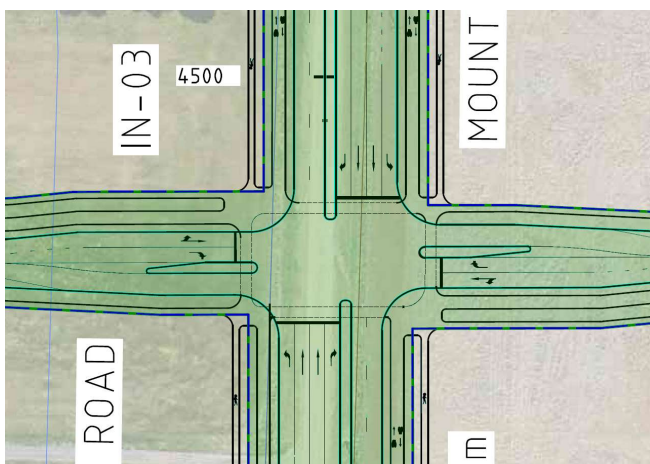
The interim and ultimate kerbs up to the extent of the left turn lane on the eastern leg should match to avoid redundant works being shifted right at the intersection.



Submission C2h

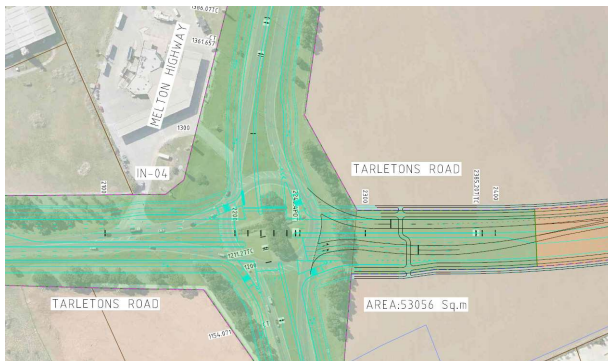
IN-03 - The separated footpath and bike path treatment flips from the northern side on the west leg to the southern side on the east leg. This drawing should be amended to allow for continuous for east-west travel and avoid crossing the road. It is noted there are open space and community facilities on the southern side so this is the preferred side to have this treatment.

Separated paths should be on the southern side of the connector roads.



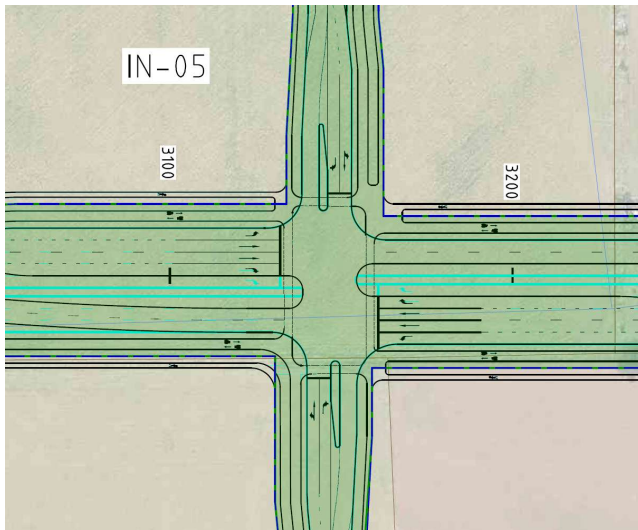
Submission C2h

IN-04 – The roundabout with pedestrian signals on eastern leg is not supported. Council requests that this should be changed to be a fully signalised intersection to improve safety and efficiency for all legs and modes of transport.



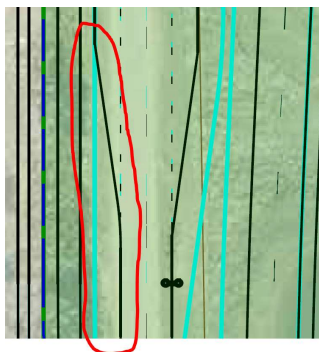
Submission C2i

IN-05 - Separated paths should be on the western side of the connector roads.



Submission C2j

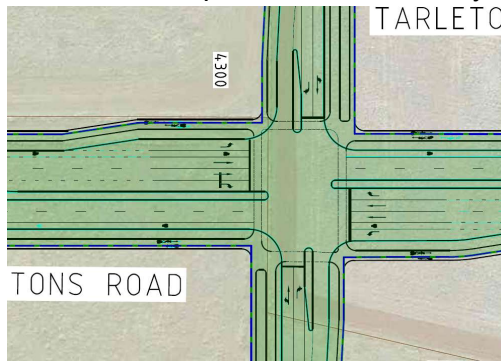
IN-06 - The western carriageway on the southern leg seems to have significant redundant kerb lines between interim and ultimate arrangement. Council submits that the interim and ultimate kerbs on the western side are consistent to avoid removing kerbs in future.



Submission C2k

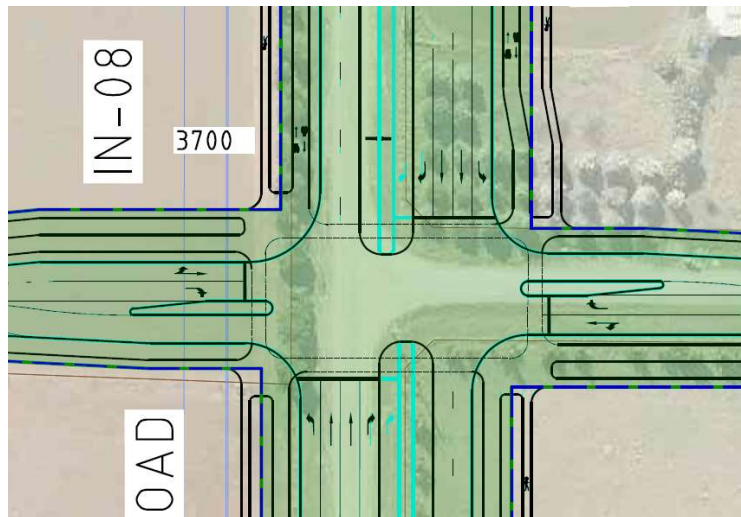
IN-07 – Council submits that the separated paths should be on the eastern side of connector roads. Council questions why are on-road bike lanes and shared paths provided here instead of the off-road separated footpath and bike path treatment?

Left turns on Tarletons Road seem short. To be reviewed with updated VPA transport assessment report and SIDRA analysis.



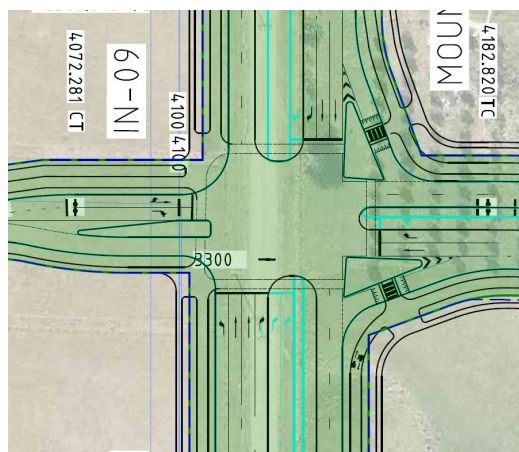
Submission C2l

IN-08 – Change the separated paths to be on the southern side of the connector roads.



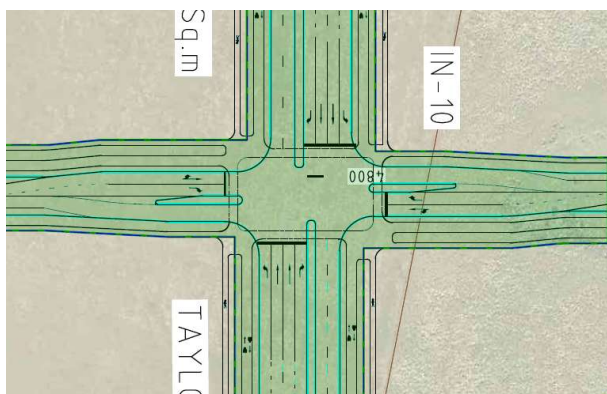
Submission C2m

IN-09 – Change the separated paths to be on the southern side of the connector road.



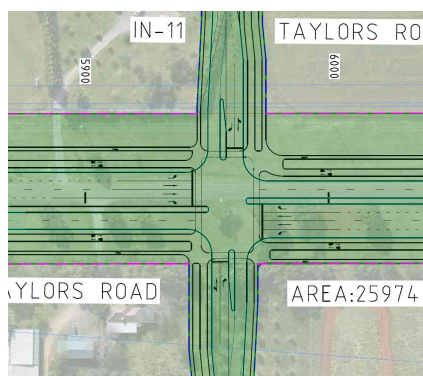
Submission C2n

IN-10 - Change the separated paths to be on the southern side of the connector road.



Submission C2o

IN-11 - separated paths should be on the east side of the connector roads.

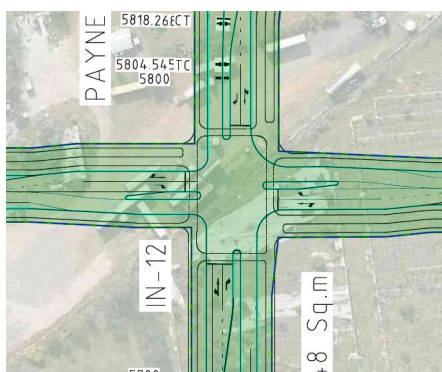


Submission C2p

IN-12 – Council submits that the separated paths should be on the south side of the east-west connector roads. The small section of separated paths on the east side of the northern leg seems unnecessary due to shared paths being present to the north and south of this small section.

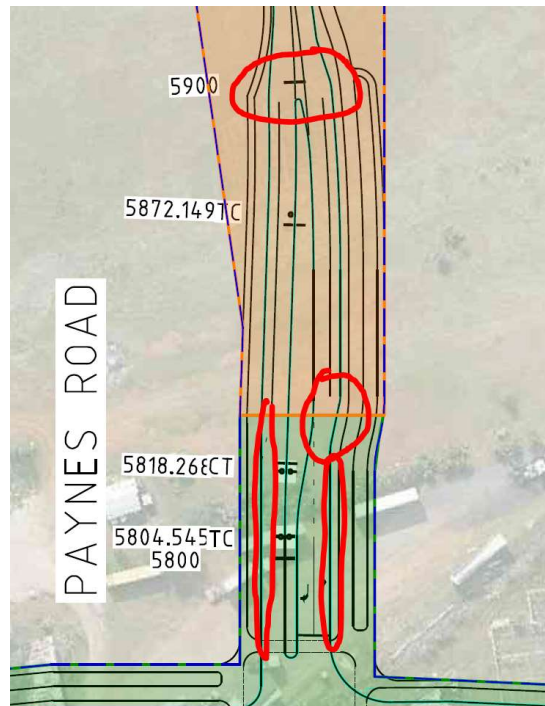
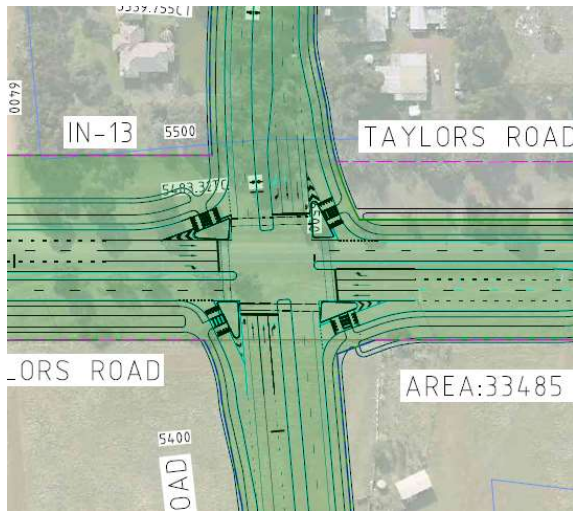
The on-road bike lanes are not adequately connected through the intersection and to shared paths when they start and end. Council preference is for separated footpaths and bike paths rather than shared paths and on-road bike lanes.

Right turn lanes look too short for adequate vehicle storage on Paynes Road both legs.



Submission C2q

IN-13 - right turn lane from Paynes Road north to Taylors Road looks too short

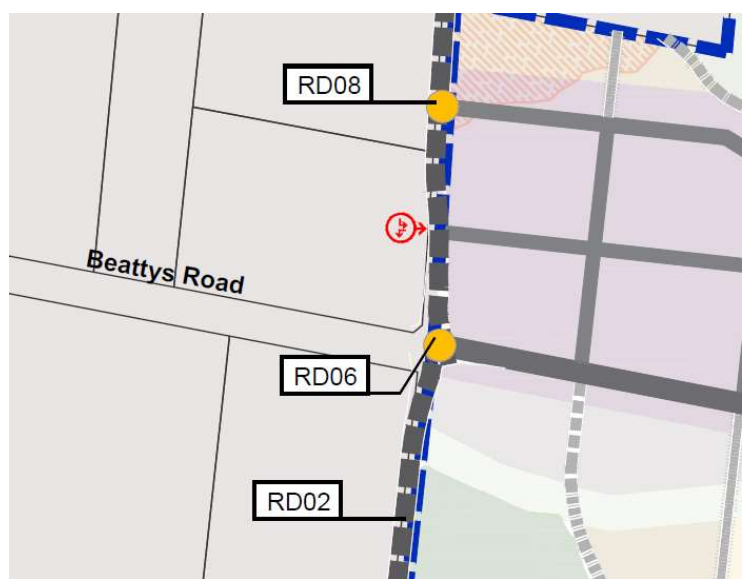
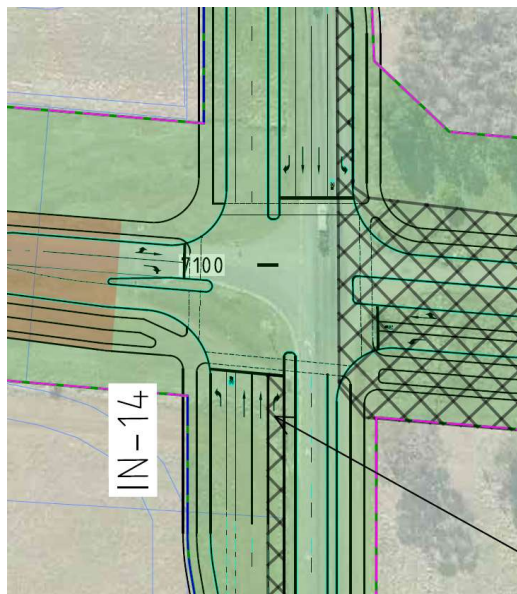


Submission C2r

IN-14 – Council submits that separated paths should be on north side of the connector road.

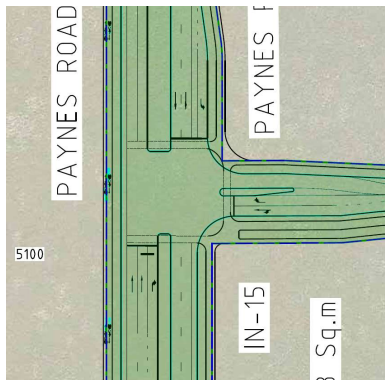
Council does not support the eastern leg and turn lanes being excluded from this ICP and identified as "funded by delivery agent". Note this is signalised intersection RD-06 in Rockbank North PSP and this ICP should add the remaining scope required.

The western leg should be designed in a way that maximises the landscaping/ open space in Beattys Road corridor by pushing it to the northern or southern extent of the road reserve, not separate into two smaller landscaped areas



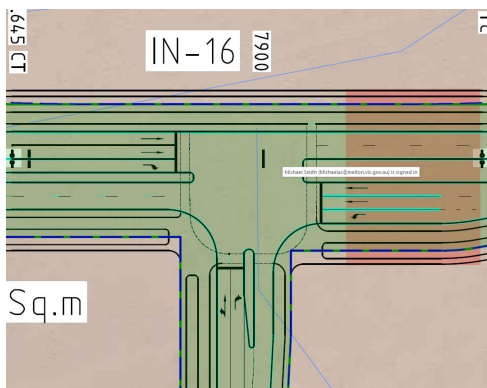
Submission C2s

IN-15 – Council submits that separated paths should be on the northern side of connector road. There should be no straight arrow for the eastern leg Left turn lane from northern leg to eastern leg seems very short.



Submission C2t

IN-16 – Council submits that there should be no straight arrow for the southern leg.

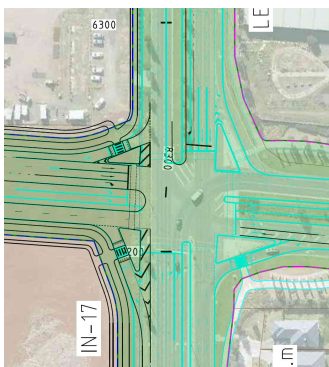


Submission C2u

IN-17 – Council submits that the interim and ultimate kerbs should align wherever possible to avoid redundant works when upgrading the intersection.

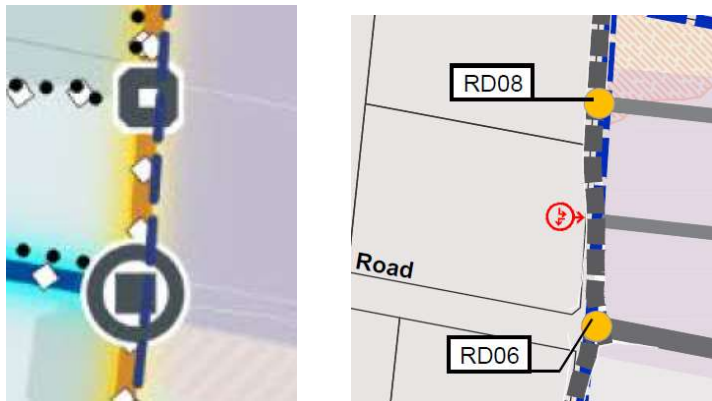
There are currently on-road bike lanes on the eastern leg of Taylors Road and both sides of Leakes Road. This intersection should include the logical tie-ins from bike lanes to the path network where they are not continuing.

The interim arrangement should allow for two right-turn lanes from Taylors Road west leg onto Leakes Road due to high demand to access the Western Highway.



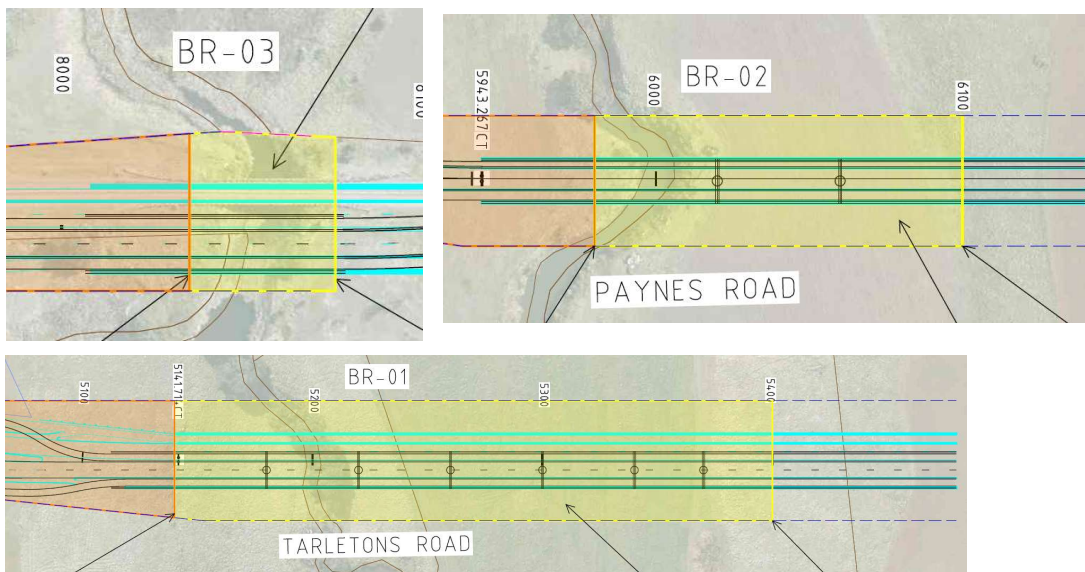
Submission C2v

Council submits that pedestrian signals on Leakes Road north of Beattys road should be shown as a signalised T-intersection as per the Rockbank North PSP RD-08.



Submission C2w

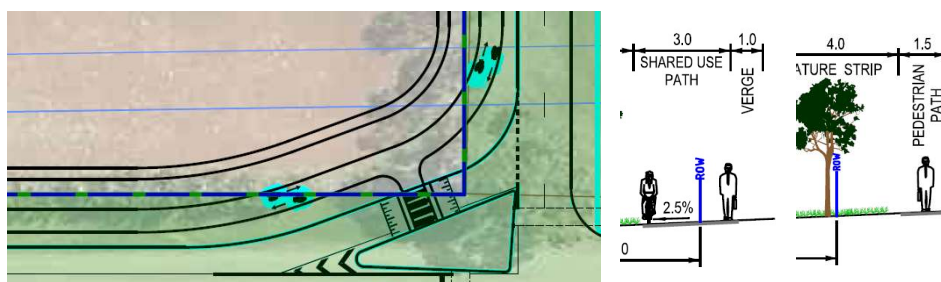
Council submits that the road extents extend beyond bridge infrastructure which isn't feasible to build without the bridge itself. Bridge project extents should capture the full extent of barriers and/ or batters of the bridges.



Submission C2x

Council submits that Pedestrian bridges and pedestrian signals are required to be captured as ICP items, not for Council to fund separately.

Road cross sections and intersections show required infrastructure outside of the land allocation. Land allocation for road reserve must capture the full width and splays to accommodate the required road, path and road-related infrastructure.



Submission C2y

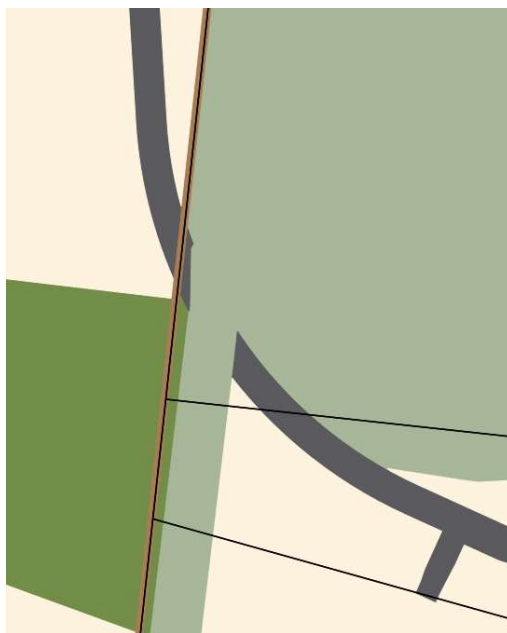
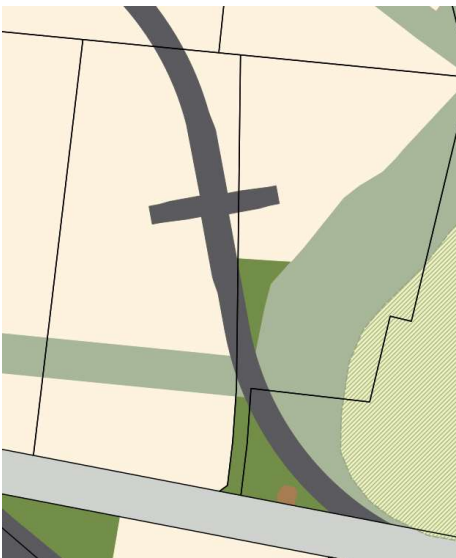
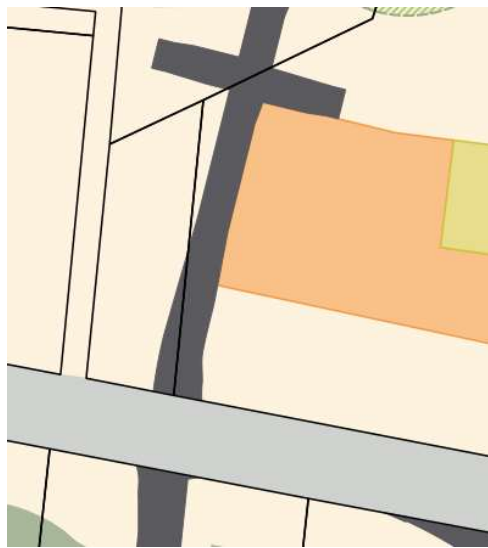
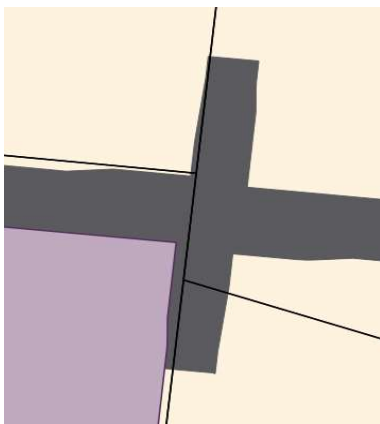
Council submits that road alignments should be changes to minimise the number of properties required to complete the road/ intersection and should avoid creating undevelopable segments of land.

IN-07 should be shifted west to ensure the property that includes the town centre can also build the road without requiring significant infrastructure in the eastern properties.

RD-03-02 should be shifted west to be constructed in the one property boundary.

IN-13 should be shifted east to fit within the property that includes the school and community facility.

RD-03-04 should be shifted west to avoid the corner of the northern property which has minimal development opportunity. This will likely hold up this road connection from being constructed.



Submission C2z

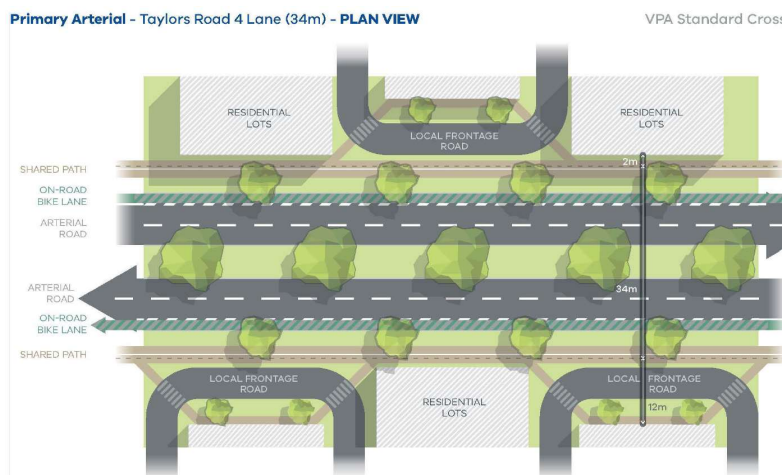
Council submits that the dog-leg connector road intersections with a pedestrian signal at the school precinct in close proximity to open space and activity centre is not supported and should be changed. This needs to be a consolidated cross intersection, either identified as a signalised intersection or a roundabout with raised priority crossings to improve safety in an area that will have high volumes of vehicles, pedestrians and cyclists



Submission C2aa

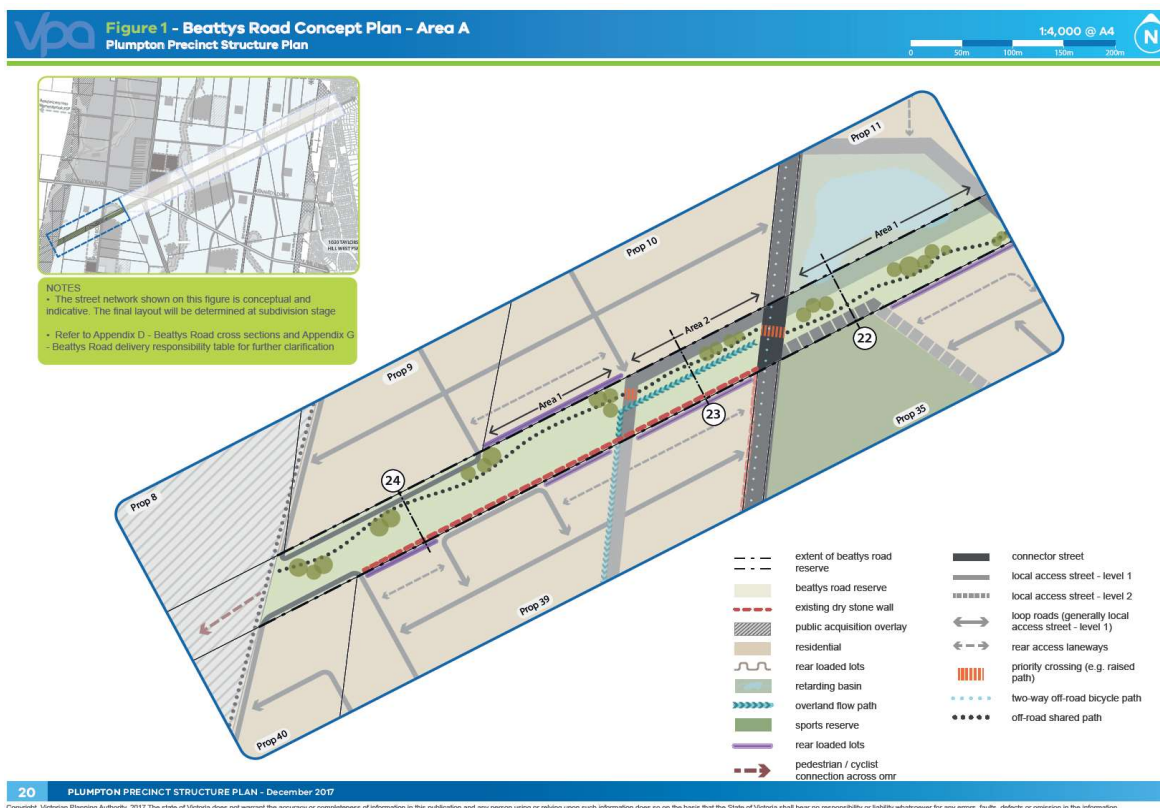
The Taylors Road plan view on page 81 of the PSP document should be changed as it does not match the ICP FLPs and cross sections. There are no on-road bike lanes shown for this road, and there are separated footpaths and bike paths, not shared paths.

The proposal for the footpaths to cross every local road is also a poor outcome for pedestrians that want to walk along this corridor, as they will constantly be zig-zagging across local roads and coming back as the wider path is designated for cyclists only.



Submission C2ab

The Plumpton PSP shows concepts for the Beattys Road corridor to show how the large road reserve should be used. Council request that the PSP be changed to include this concept also.



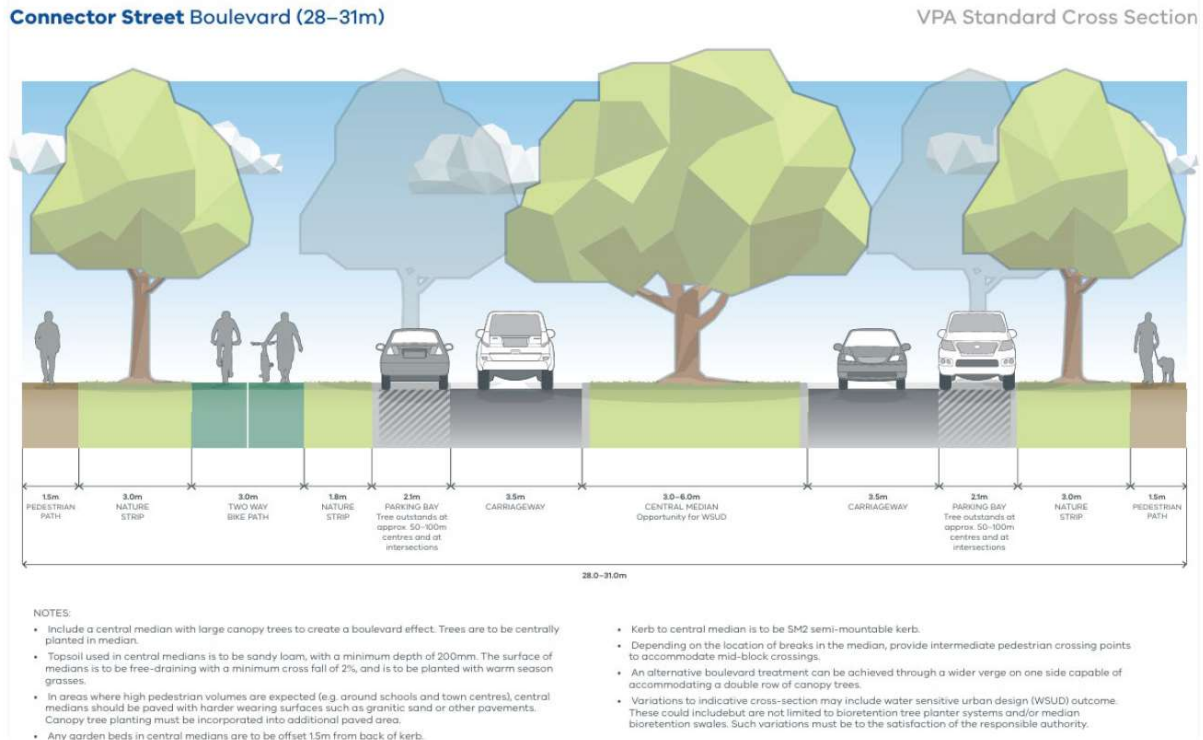
Submission C2ac

Council requests that the PSP capture the appropriate outcome regarding Connector-Connector road intersections being a roundabout with raised priority crossings to improve safety. This should be either on a plan or as a requirement.



Submission C2ad

Council requests that the variation on the road reserve width for the connector street – boulevard should be removed and the PSP should nominate each road reserve width applies. Council officers would welcome the opportunity to work through the application in the PSP with the VPA to form an agreed position.



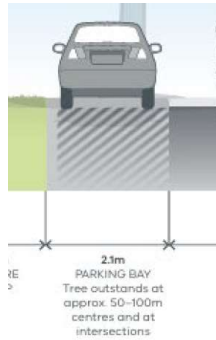
Submission C2ae

There are several locations shown on the Native Vegetation Retention & Removal plan where trees or vegetation are identified as "must be retained" in road reserves.

Council requests that the PSP and relevant documents be updated to confirm the road alignments and layouts have considered these and been designed to preserve the them or to show the trees or native vegetation to be removed.

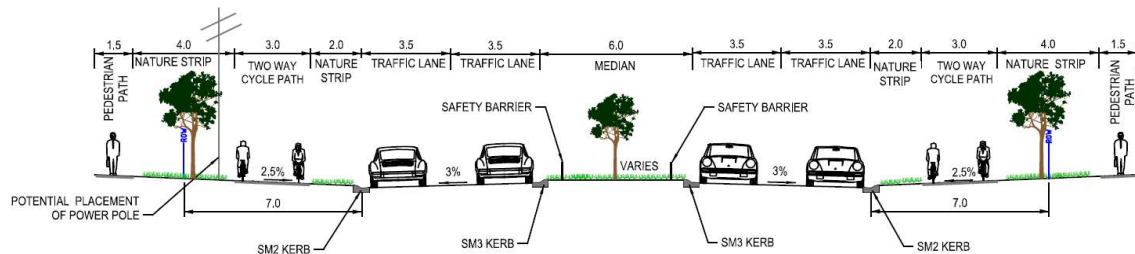


Council requests that the PSP be changed to show 2.3m wide parking bays on connector roads to ensure adequate clearance between parked cars and through-traffic.



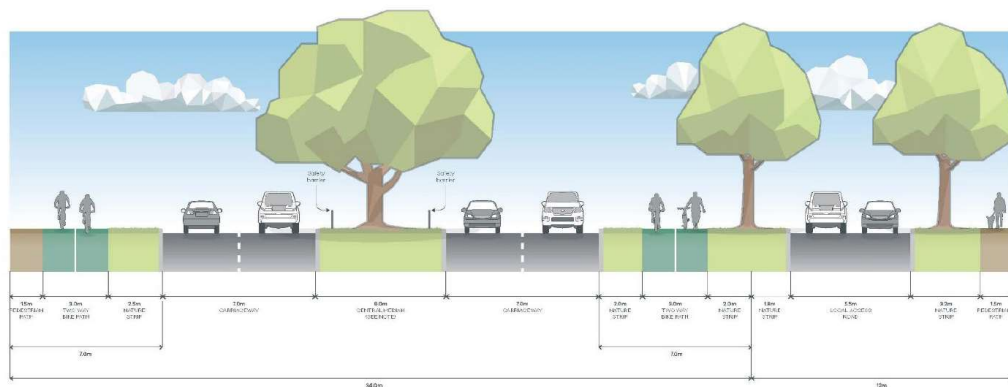
Submission C2a9

The cross sections in the PSP and ICP don't match. Council requests that relevant documents in the Amendment be amended to be consistent to ensure the correct infrastructure is built.



PRIMARY ARTERIAL 4 LANES

Primary Arterial 4 Lane (34m) - Compressed

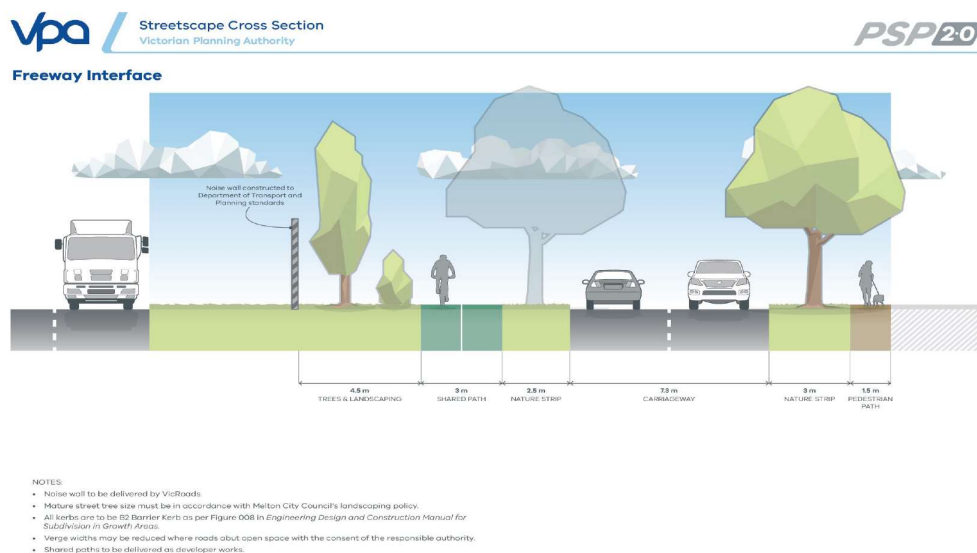


Submission C2ah

Council request that the PSP be amended to show a typical cross-section for a 4-lane Secondary Arterial Road.

Submission C2ai

Council request that the PSP be changed to show / mark the extent of freeway in the Freeway Interface Road. Council requests that a shared path be shown as part of the interface road to facilitate delivery and ownership.



Submission C3 – Active Transport Planning Changes.

The VPA is requested to make important granular changes to the active transport planning sections of the PSP to improve outcomes.

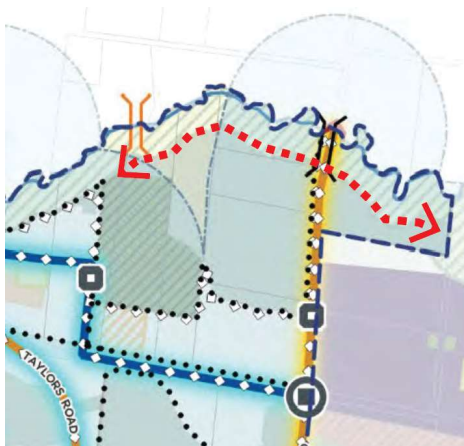
As a general principle, Council considers that the separation of footpaths and bike paths is an improved outcome, rather than a shared path to avoid cyclists colliding with pedestrians leaves pedestrians walking in groups or with dogs to either squeeze onto the narrow footpath or walk on the bike path anyway. The separation of the paths also divides the nature strip, making it more difficult to establish large canopy trees.

Other refinements are provided in the detail of Council's submission.

Submission C3a

Kororoit Creek shared path. Kororoit Creek is a regionally significant waterway, which provides the opportunity to establish a continuous active transport/recreational trail from Melton East to Port Phillip Bay at Altona.

The West Corridor Growth Plan recognises this significance and identifies Kororoit Creek as part of the Metropolitan Trail Network (MTN). The Melton East PSP generally aligns with this intent by proposing an off-road shared path, however there is a notable gap in the proposed shared path along the creek in the vicinity of the regional open space and crossing Leakes Road (see plan extract below).



Council request that the PSP is changed to extend the proposed off-road shared path along Kororoit, generally as shown above.

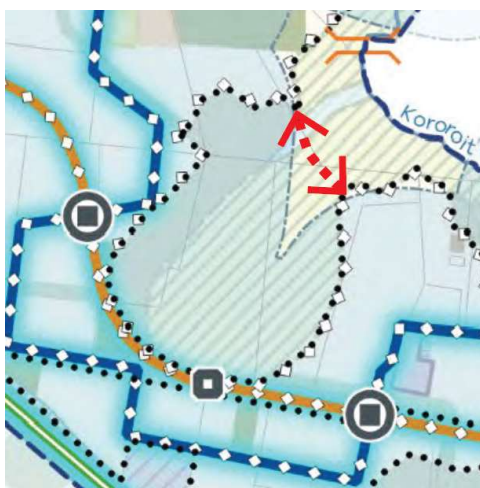
Council also request that the PSP recognise the MTN context for Kororoit Creek in the PSP.

Submission C3b

Main central conservation area shared paths. The off-road shared path within the Kororoit Creek corridor is shown to deviate southward around the perimeter of the conservation area. Council notes that this avoids the need to provide a crossing of the intervening drainage channel, however, also creates a large deviation (around 2.5km) for walkers.

The PSP should be changed to show a direct connection along the creek corridor (see plan extract below). A low-level boardwalk form may be required in response to conservation requirements. A crossing of the channel may also be required, depending on alignment options.

Given the location context, funding via the ICP is likely to be the most appropriate mechanism to enable delivery.



Submission C3c

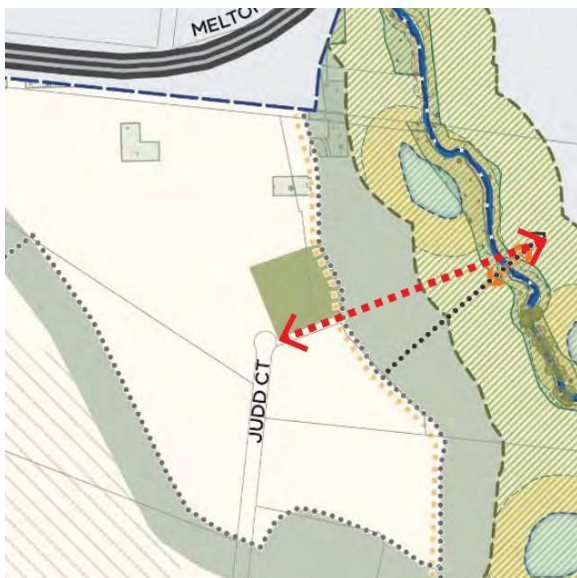
Taylor's (Beattys) Road shared path. The shared path proposed along the north side of Taylor's Road is discontinued from the eastern approach to the main conservation area. This would require pedestrians to cross the arterial road twice.



Council requests that the PSP be amended to designate an off-road shared path connection along the full extent of Taylors Road on the north side, and connecting directly with the main conservation area.

Submission C3d

Judd Court shared path. Council acknowledges that the alignment is indicative. However, a preferred arrangement is to connect the shared path alignment more directly with the proposed local open space. Council notes that this may be inhibited by a future CHMP or native vegetation issues, however a preferred alignment should be represented as a starting point.



Council requests that the PSP be amended to realign the indicative shared path connection at Judd Court as shown.

Submission C3e

Open space, conservation area and drainage reserve interfaces. The PSP includes extensive interfaces to these areas and the associated urban design approach will be critical.

Council notes that the PSP includes “*R2 Subdivision applications for residential development must suitably demonstrate: Active interfaces with the adjacent street, open space, waterways and drainage reserves.*”

Council requests that requirement is supported in the interest of preventing poor interface outcomes, however the PSP should be changed to show critical park edges where a street interface is required, and to include a corresponding ‘park edge’ street typology within the PSP.

Submission C3f

Undeveloped road reserves. The PSP is not clear about how two segments of the existing road reserve for Taylors (Beattys) Road, that will not be developed for roading, are to be used. These segments are proposed to contain off-road shared paths, so will in effect be public land that forms part of the open space network.

The eastern-most segment can be combined with the proposed local parks (LP-09 and LP-10) in a reconfigured form.

The western-most segment may be of less public benefit other than for a linear connection with shared path.

Additionally, Taylors Road is proposed to be 34 metres width within an existing ROW of 60 metres width. Again it is unclear how unused width of the ROW is to be used.

Council requests that the PSP is changed to review unused road reserve segments and designate 'other uncredited open space' (or similar) – as appropriate - and indicate clearly on Plan 6 Public Realm.

Council also request that the PSP clearly identify the intended land use/s for the excess ROW width for Taylors Road.

Submission C3g

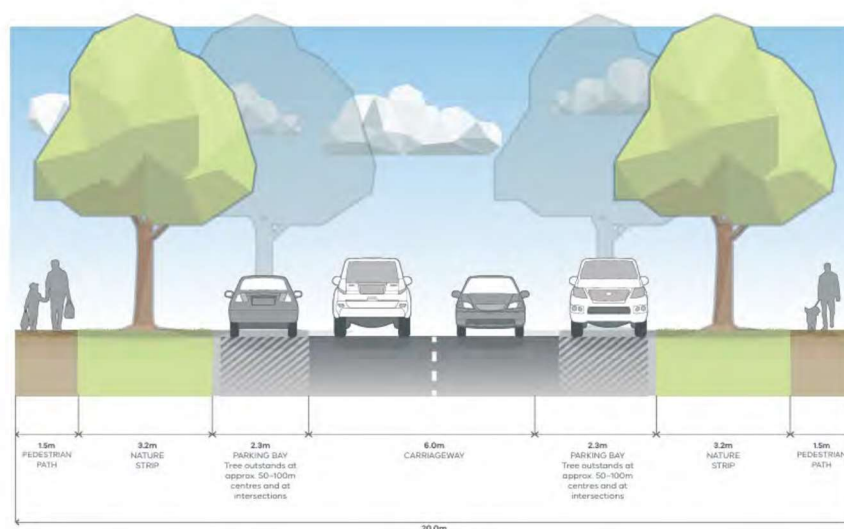
Local access streets. An alternative standard Local Access Street cross-section which can assist in responding to the impacts of increased development density on residential streetscapes is supported in principle.

Access street (level 2) is included in the PSP, however the conditions under which this is to be applied are unclear.

The allocation of the additional 4 metres in width, compared to a standard 16 metre cross-section, is unfortunately mostly absorbed by on-street parking. Consequently, verge widths are only modestly wider (6.4m cumulative width, compared to 5.7m cumulative width for standard access street). The impact of additional driveway crossovers will significantly erode these small gains in soil permeability/accessible volume to support establishment of street trees.

Local Access Street Level 2 (20m)

VPA Standard Cross Section



Council requests that the PSP be amended to show:

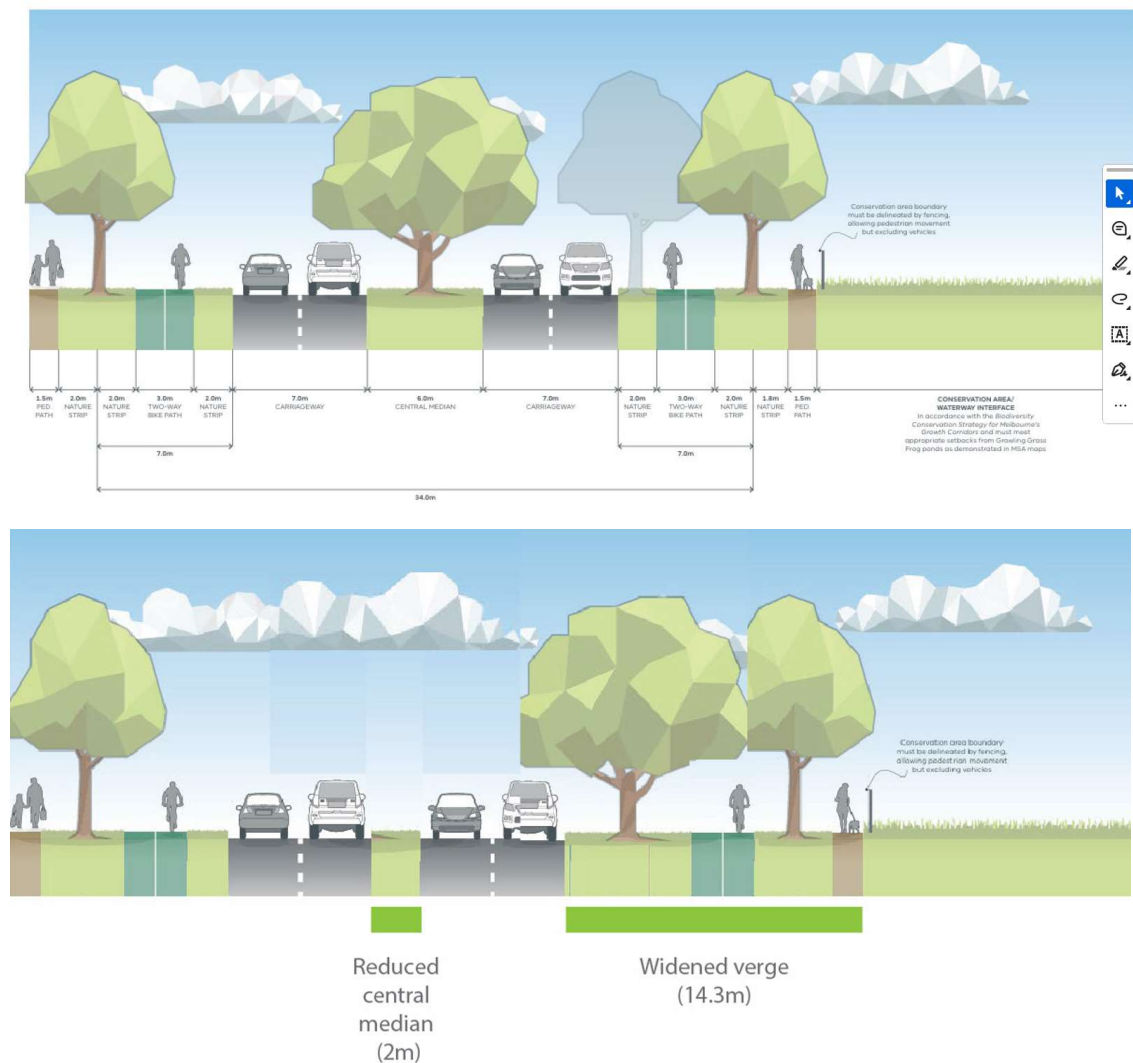
- Provide for a single footpath only.
- Provide for single-sided on-street parking, or alternating parking bays to each side.
- Show a note “Permeable paving to on-street parking areas to be considered”.
- Lowered services for increased unimpeded soil depth, and some services under footpath.

Council requests that alternative access street cross-sections should be developed and included in the PSP.

Submission C3h

Cross-sectional design. Council request that the PSP should include text to provide for the opportunity to modify cross-sectional design in targeted areas to signify response to local conditions and places and improve public realm outcomes.

For example, the Taylors Road cross-section along the interface of the main Conservation Area could be modified as shown below:



This creates additional separation between traffic and conservation area and additional pedestrian corridor width to support more tree planting within the pedestrian zone.

This outcome also gives primacy in the reading of the visual landscape to the conservation area. Species selection along this section could also be modified for compatibility with the conservation area.

Submission C3i

Pedestrian Operated Signal (POS) Crossing locations. The nominal locations in the PSP should coincide with destinations, activity and main path connections. This will provide for integrated public realm treatments to reinforce sense of place. Council requests that the VPA review all locations and based on the two examples below.

- **Taylors (Beattys) Road – at conservation area.** This POS should more directly connect the open spaces on either side of the road.



- **Taylors (Beattys) Road deviation.** This POS should more directly connect the drainage reserve and active open space/school, as well as coincide with shared path alignments.



Submission C3j

Separation of Bike Paths. The separation of footpaths and bike paths rather than a shared path is good in theory to avoid cyclists colliding with pedestrians, however this leaves pedestrians walking in groups or with dogs to either squeeze onto the narrow footpath or walk on the bike path anyway.

The separation of the paths also divides the nature strip, making it more difficult to establish large canopy trees. Council submits that in most instances a wider shared path is a better solution. There may be specific locations where a dedicated bike path is appropriate in high bike activity areas.

It is noted that connector roads have separated footpath and bike path treatment on one side, and footpath only on the other side. The separated paths should front activity generators such as schools, shops and open space, with minimal road crossings.

Council submits that the VPA should review the location of dedicated bike paths, and constrain their location to specific areas.

Council submits that the PSP be amended to clearly show the separated path network.

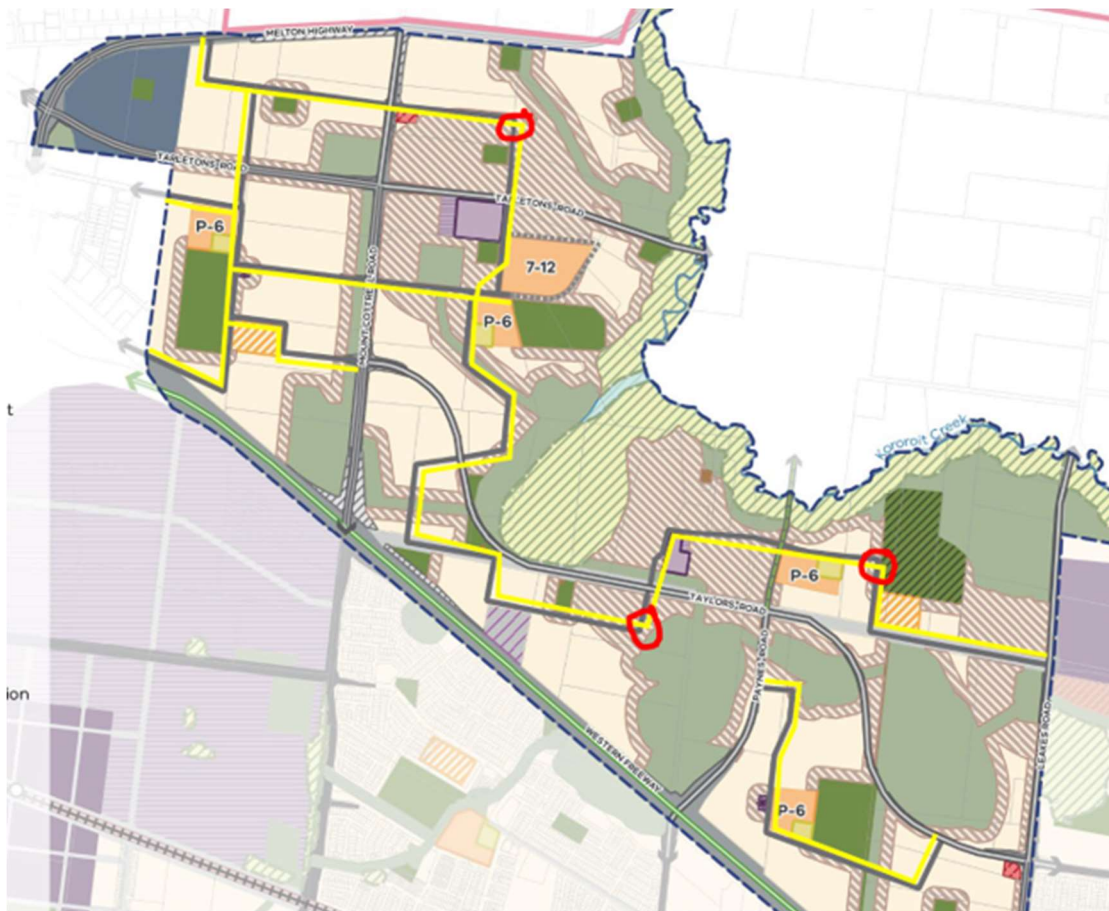
Submission C3k

Location of paths on the side of each road. Council submits that the PSP should be amended to show dedicated or shared paths on the correct side of the road.

Council has marked up the preferred side for the paths (on connector roads where they are only on one side) in yellow lines, and circled where they should cross the road to ensure they are located on the preferred side.

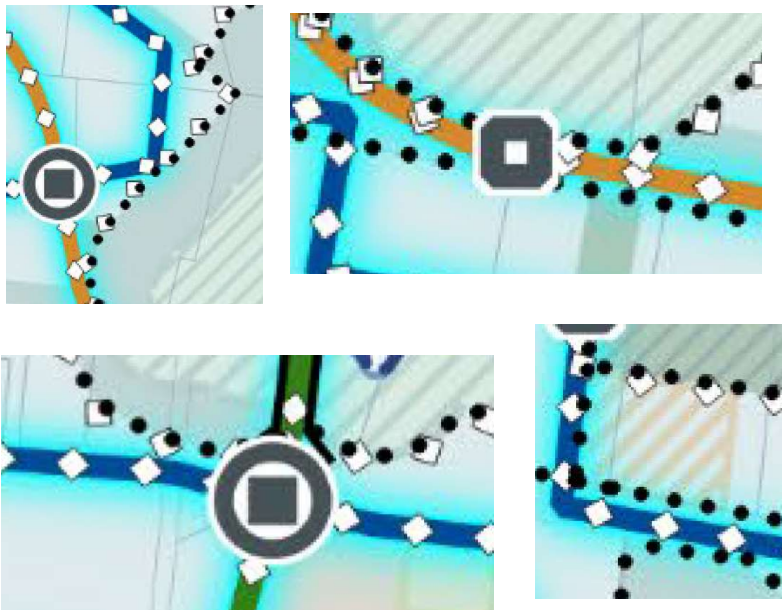
The ICP FLPs often have these paths on opposite sides of the road, meaning cyclists need to constantly cross the road to continue along a corridor.

ICP FLPs should be amended to show the correct side of the road for this treatment.



Submission C3l

Council request that the PSP is amended to avoid duplicating paths. Some paths near conservation areas are close to road paths and can be combined as shown in the examples below.



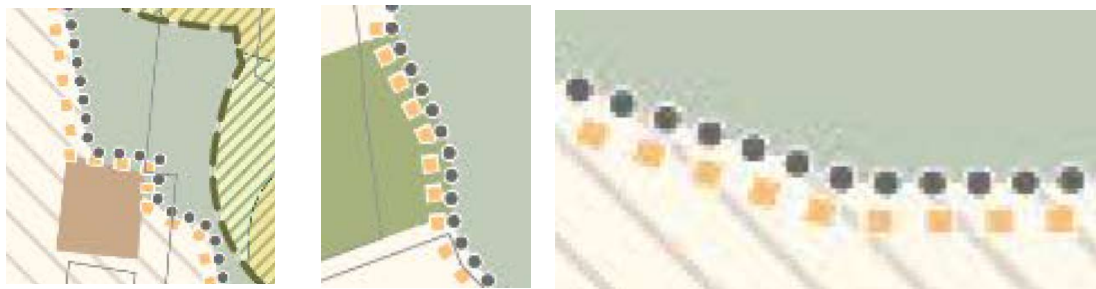
Submission C3m

Council submits that one wider shared path is more appropriate than having shared paths and bike paths next to each other along the conservation areas.

These paths are primarily for recreational walking and cycling and don't require full separation.

..... off-road shared path (indicative)

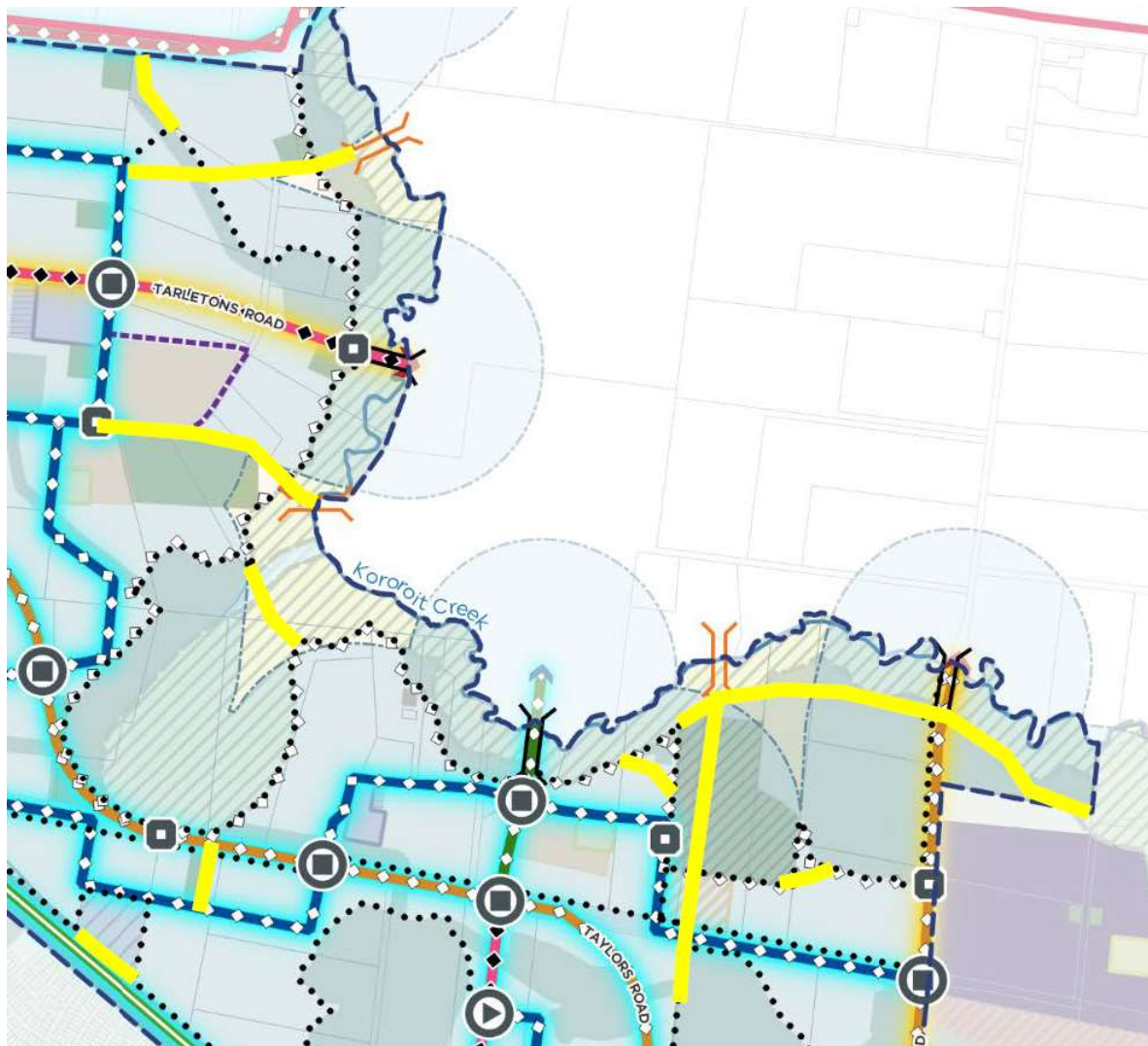
..... off-road two-way bike path



Council requests that the PSP is amended to show a single path where possible, and avoid the duplication of paths as shown in the examples above.

Submission C3n

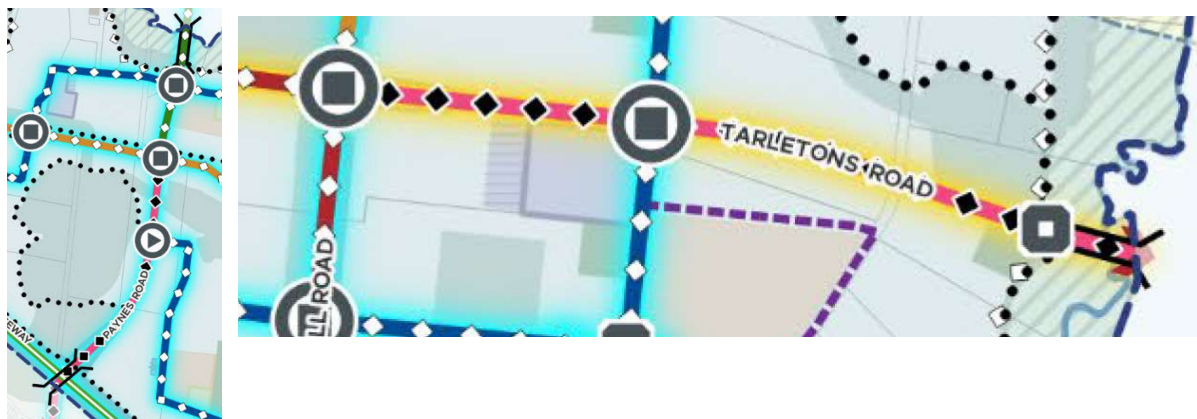
Council submits that there are several locations where paths are indirect for pedestrians and cyclists. Council submits that the PSP should be changed to show the additional/ realigned paths below to smooth out the journey.



Submission C3o

Council submits that separated footpaths and bike paths are preferred to shared paths and on-road bike lanes for secondary arterial roads (Paynes Road and Tarletons Road).

The paths can merge to shared paths over bridges



Submission C3p

Council submits that the pedestrian signals on Tarletons Road east of IN-04 don't provide a logical connections for pedestrians and cyclists as it is located at the rear property boundary with no through connection to the south. Council requests that the PSP be amended to address this issue.



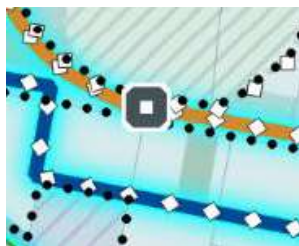
Submission C3q

Council requests that the PSP is amended to show the shared path run under Tarletons Road bridge on the west side of Kororoit Creek to eliminate conflict with vehicles and remove the need for pedestrian signals.



Submission C3r

Council submits that the PSP should be amended so the pedestrian signals on Taylors Road west of IN-11 should align with the local open space to the south. Either the signals or the local park should be shifted.



Submission C3s

Council requests that the PSP is amended to show the pedestrian signals on Taylors Road between IN-13 and IN-16 relocated to align with the north-south shared path running along the open spaces.



Submission C3t

Council requests that the PSP is amended to address the issue with the pedestrian signals on the connector road east of IN-12 as they are unnecessary given the expected vehicle and active transport use in this location and close to a bend in the road.

The PSP should instead show a raised priority crossing for pedestrians and cyclists may be more appropriate and determined at the development stage.

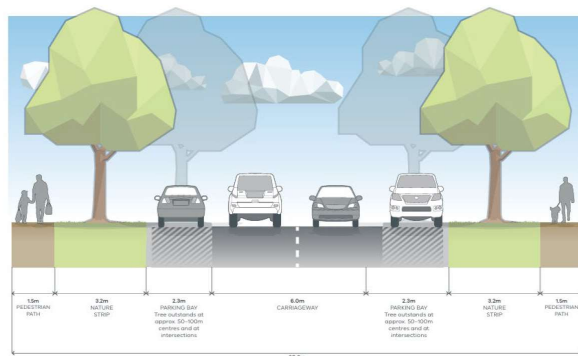


Submission C3u

Council requests that the local access street level 2 that wraps around the school south of Tarletons Road should include shared paths along the school frontage and link to the surrounding shared path network.

Local Access Street Level 2 (20m)

VPA Standard C



NOTES:

- Minimum street tree mature height 12 metres
- All kerbs are to be 80 Barrier Kerb.
- Verve widths may be reduced where roads abut open space within the consent of the responsible authority.



Submission C4 – Housing Density and Diversity.

Council has identified changes to and refinements regarding the approach to the housing diversity and density provisions of the PSP to improve outcomes.

Council is concerned with the impact that the proposed blanket density target may have on community infrastructure the road and tree canopy. The potential for impacts include:

- Limitation of street tree provision.
- Inadequate housing diversity.
- Increased Urban Heat Island Effect.
- Undefined urban structure with inadequate attention to height and landmarks.
- Car-dominated town centres.
- Rear-lane dominated developments.
- Lack of private secluded open space over a large-scale area.

Figure 2 below provides an example of rear loaded medium density housing in the Melton context.

Figure 2: Melton Context Medium Density Housing



Council submits that a blanket density of 40dw/ha in the Melton context will most tend to result in a large volume of single storey, 4.5m wide, rear loaded small lot housing code developments. This would lead to a monotonous, over 90% sealed surface environment with the risk of increasing the urban heat island effect.

This typology heavily relies on street tree planting but due to the lead in services (water, stormwater, sewer, telecom) into every house, every 4.5m, there is limited space for deep soil area for canopy trees to grow. Council notes that this typology comes with a reduced front setback of 1.5m that further reduces any opportunity to plant larger shade trees within the road reserve.

Council also considered that a blanket density does not provide Council with sufficient means to encourage housing diversity as the above described is the most economically delivered with a short-term benefit for the developer.

Council submits that rather than establishing blanket density target and / or a scattered approach to higher densities throughout the precinct, densities should be strategically located

- To respond to its context and interfaces.
- To focus on proposed road based public transport corridors being the roads described earlier in Council's submission (the Arterial Troad Corridor).
- To shape the urban structure and frame roads.

- In proximity to town the activity centres.

The driver for 'the right density' should be

- Delivery of compact urban form to maximise limited developable land within this PSP.
- Access to public transport and services.
- Delivery of minimum canopy cover within the streetscape.
- Establish minimum density requirements that will be applied to deliver a **compact urban form** as illustrated on a **density and typology plan** and include 4 distinct, site specific typologies
 - Shop-top housing within the activity centres (Activity Centre Typology).
 - Medium density housing within 400 metres of activity centres (Standard Town House Typology).
 - Medium density to capitalize on the unique location and opportunity for access to the green spine, shared path network as well as long view lines towards the Kororoit Creek (Wetland Interface Typology).
 - Higher density housing within 400 metres of the Arterial Road Corridor.
 - a. The Arterial Road Corridor will be a key destination for public transport by supporting higher density neighbourhoods, delivering fast and convenient services.
 - b. Land for a dedicated, separated public transport infrastructure will be secured along the corridor to ensure that bus rapid transit (BRT) can be supported as part of urban development and further expanded to connect into Rockbank PSP, the established Melton areas, as well as Cobblebank City Centre, Hospital, Schools and Cobblebank Community Hub.
 - Medium and high density housing areas will incorporate high quality public realm to compensate for smaller private spaces.
 - Housing in medium density areas will cater for the 'missing middle' housing types.

D. PSP Drafting Changes.

The following PSP drafting changes should be made to the Amendment:

Submission D1 - Strengthen the Decision-Making Framework to Support New Policy Approaches.

Submission D1a – Implementation Worked Examples

The PSP proposes new policy approaches that will impose an implementation burden on Council. Council requests that the PSP is amended to provide a stronger decision-making framework to make the administration of these requirements efficient and effective.

The PSP includes a range of new approaches to key policy issues. Council submits that the VPA should provide Council with a practical worked examples of different development contexts to show how it intends that Council will administer these requirements. Council requests that the worked examples include the following concepts and address the issues outlined below.

Submission D1b - Development Staging

The PSP adopts the VPAs new approach to development staging and its implications for the PSP delivery. Council requests that a range of permit application scenarios are provided in different staging context to explain how the VPA intends Council to respond to the staging requirement. An example where a development proponent proposes interim arrangements should form part of the analysis.

Submission D1c - Acoustic Management

The PSP includes a new approach to managing traffic noise which appears overly complicated and which can be simplified.

Freeway Noise

The freeway related noise should be considered separately to arterial road based noise.

Freeway related noise is normally addressed by the Agent of change using the existing planning scheme policies. The cost of mitigating freeway noise is extensive. Given the Government proposes to rebuild the Western Freeway, it would seem appropriate that the freeway works provide for noise mitigation as part of the freeway works. This will ensure a high standard of noise treatment is provided using robust materials and in accordance with the project business case. This may then allow initial developments to provide an appropriate, but more cost-effective treatment. The details need to be worked through in case studies by the VPA and to the satisfaction of DTP and the EPA and in conjunction with development proponents and Council.

Arterial Road Noise

Noise modelling routinely demonstrates that the shielding offered by boundary fencing and a house / built form can result in noise levels on lots behind the first row of homes will usually meet the relevant acoustic standard.

Some consideration is required regarding lot orientation with respect to whether traffic noise objective would be achieved in outdoor living areas at the rear of any given lot. South facing

lots that front the noise source for example protect the rear yard of those homes and consideration is required to different lot configurations in each circumstance.

Bedrooms and living spaces of the first row of lots facing the traffic noise source may require minor improvements to lightweight facade construction to achieve the internal noise criteria.

Due to the reduction of traffic noise with increasing distance from the road, modern energy-efficient building envelope constructions for lots north of the first row dwellings may provide sufficient traffic noise reduction to allow internal noise level criteria to be achieved, provided windows are closed.

In many instances, cooling systems that require external windows or doors to be open (e.g. evaporative cooling) are not recommended, as the need for windows to remain open will be significantly detrimental to traffic noise sound insulation.

Council requests that the PSP be amended to include a simplified Permit Application Requirement as follows:

A permit application must be informed by an acoustic assessment report prepared by a qualified acoustic engineer, which applies the following noise objectives:

- 35 dB LAeq,8h when measured within a sleeping area between 10 pm and 6 am.
- 40 dB LAeq,16h when measured within a living area between 6 am and 10 pm.

The report must include recommendations for any noise attenuation measures required to meet the applicable noise level objectives.

The PSP should include the following alternative approach:

A Permit may impose the following mandatory Condition which will ensure each dwelling meets the required noise standard:

“A permit to subdivide land must require a restriction on titles requiring buildings (and associated works) for accommodation, to be constructed in such a way as to ensure internal bedroom noise levels will not exceed 35 dB LAeq,8h when measured within a sleeping area between 10 pm and 6 am and also 40 dB LAeq,16h when measured within a living area between 6 am and 10 pm. The restriction may include specific construction requirements to the satisfaction of the responsible authority.”

Council considers that the benefit of this alternative approach is:

- The permit condition is simple to apply and does not require an acoustic report to be submitted at the Planning Permit Stage.
- The restriction will be applied through the normally subdivision certification and Statement of Compliance process.
- A Building Surveyor will not issue a permit for a dwelling unless they are satisfied that the dwelling design will meet the restriction on title.
- The lot owner will need to have an acoustic report for their house design to satisfy the Building Surveyor and get a Building Permit.
- The Building Surveyor is responsible for ensuring the house is constructed to meet the standard.
- Council does not need to assess individual houses and acoustic reports.

The Wyndham North growth area has adopted an approach to rail noise by applying DDO 10, which includes a similar requirement to the above.

This approach as adopted by the Ministerial Advisory Committee for the Regional Rail Link after hearing extensive evidence and based on planning, acoustic and legal advice and so is robust.

Order of dwelling construction and fences. Under the proposed provisions, there is no specific need for Council to manage building construction staging. Every residential lot will have to satisfy the noise requirement. It will be in the developer's interest to stage the development and housing to reduce the need for dwellings to have to be upgraded to meet the requirement.

Housing and Design Guidelines. It is helpful for the Developer to provide information to purchasers and to build in the acoustic standards into Housing and Design Guidelines. However, with the acoustic standard on title, this is not necessary. The Building Surveyor will ensure the house meets the standard. This is a stronger regulatory regime than use of Developer Guidelines.

Submission D1d – Affordable Housing

The PSP proposes strong guidelines in relation to affordable housing. Council will need to further consider whether the proposed approach is reasonable or practical.

The PSP Background Report summarises the PSP approach to affordable housing as follows:

“Affordable housing options

The Guidelines describe the feature of ‘affordable housing options’ as “affordable housing options – including social housing – that provide choices for very low, low and moderate-income households.”

The relevant performance target for this feature is T4, which requires a PSP to set a minimum target for the provision of affordable housing

In considering the appropriate response to the feature, the VPA have prepared an Affordable Housing Needs Assessment using a model prepared by SGS Economics and Planning. The model incorporates a range of inputs relating to future statewide demand for social and affordable housing and makes recommendations as to how this could be distributed at a more localised level.

The outputs of the model have been incorporated into the assessment report and are summarised as follows:

- *Subsidised market housing demand is 314 dwellings or approximately 2% of all dwellings in the PSP.*
- *Social housing demand is 12,19 dwellings or approximately 9% of all dwellings in the PSP.*
- *Between subsidised market housing demand and social housing demand, the total demand for affordable housing in the precinct area is 12% of all dwellings.*
- *Anticipated demand for 1-bedroom dwellings is highest, comprising 46% of subsidised market housing demand and 52% of social housing demand.*

The relevant sections of the PSP that implement the findings of the Affordable Housing Needs Assessment are as follows:

- *Objective 5 specifies a target of 12% of affordable housing to be delivered. The objective is proposed to be implemented by Guidelines 3-5, which encourages residential subdivision and development to contribute towards the affordable housing target and includes guidance on preferred locations for affordable housing (e.g. in proximity to high-amenity areas). These provisions are consistent with the outcomes specified by T4.*
- *Table 4 of the PSP provides guidance on the targeted income ranges and number of bedrooms within dwellings that affordable housing should contribute towards. Overall, it is considered that the PSP appropriately plans for and promotes provision of affordable housing consistent with the PSP Guidelines.*

UGZ Schedule

The UGZ Schedule provides the following:

Subdivision – Residential Development

In addition to the requirements of Clause 56.01-2, a subdivision design response for a residential subdivision of 10 lots or more must be accompanied by the information listed below. An application for the construction of 10 or more dwellings on a lot must be accompanied by the same information:

- A written statement outlining how the proposal will contribute to the delivery of affordable housing in the precinct, including any proposed delivery mechanisms.

And:

Affordable housing

Before deciding on an application to develop or subdivide land for dwellings, the responsible authority must consider, as appropriate:

- Whether the proposed subdivision application contributes towards the provision of affordable housing;
- The Ministerial Notice under 3AA(2) of the Act, as amended from time to time.

The PSP Affordable Housing Background Report provides these definitions:

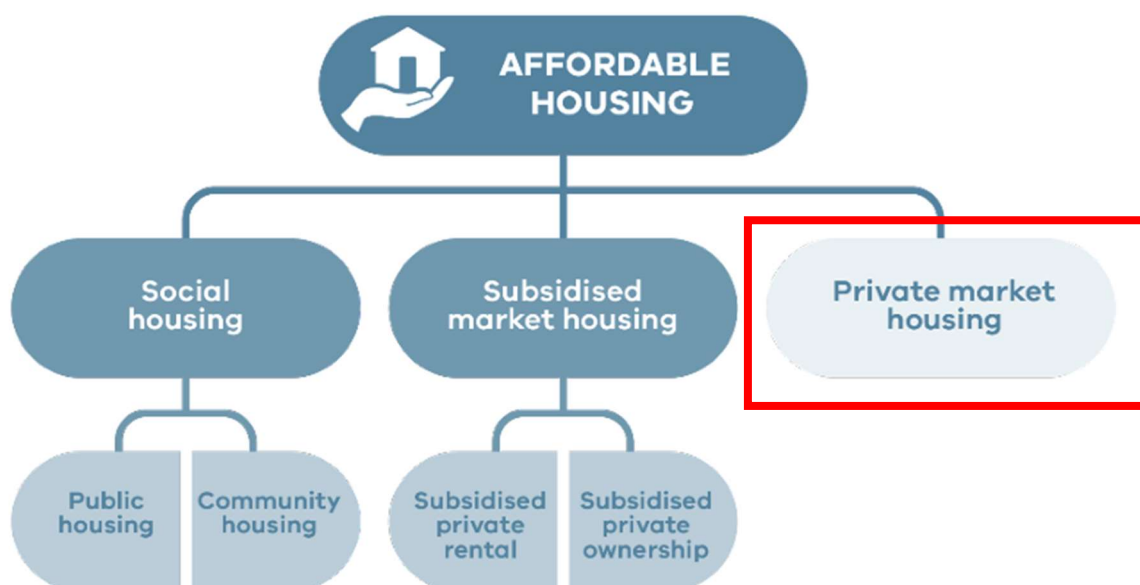
For determining total demand for local housing assistance, this report uses the definition of 'affordable housing' found in Victoria's *Planning and Environment Act 1987* (the Act): "...housing, including social housing, that is appropriate for the housing needs of very low, low and moderate income households".

Under the broad legislative umbrella definition of affordable housing sits distinct definitions of subsidised market housing & social housing:

- **Subsidised market housing** refers to housing (rented or owned) which is made available to households at below market rates through subsidies according to eligibility criteria set out in the Act. Eligibility is based on income ranges for very-low-, low-, and moderate-income households. Households that require subsidised market housing are those on low and moderate incomes and experiencing severe or moderate rental stress.
- **Social housing** which falls under the broad legislative umbrella of 'affordable housing', is defined under the Housing Act 1983 as rental housing that is provided and/or managed by the government (public housing) or by a not-for-profit organisation (community housing). Social housing is an overarching term that covers both public housing and community housing.

The VPA approach acknowledges that private market housing can also be affordable housing, if priced such that a person on a moderate income can afford. See for example:

Figure 2: Affordable housing nesting diagram



The VPA Paper also provides the following Options for Delivery:

- Gifting land or dwellings.
- Selling land or dwellings at a discount.
- Monetary contribution to an RHA, housing trust or similar entity.
- Selling dwellings to individuals under an affordable home ownership agreement. This includes shared equity or rent-to-buy.

Key Issues for Council and development Proponents

- The VPA AH report talks to PSP Figure 2 which acknowledges that private market housing can be delivered at a price point that is affordable to persons on moderate incomes. In such a case it would be defined as affordable housing. An example would be a Small Lot Housing Code Lot on say a 200m2 lot. See for example: Home Starter Range - Homebuyers Centre
- Small lot homes delivered as private market housing can deliver affordable housing to persons on moderate income ranges without a subsidy.
- However, the Melton East PSP Guidelines reference social housing and **subsidised** market housing only. They do not have regard to private market delivery affordable housing.
- It is understood that the VPA may make this distinction because market housing that is affordable is considered a response to planning policy around housing diversity. And a developer meeting the relevant market to obtain sales. However, where a developer modifies their standard lot mix preference to deliver more private market affordable housing they should be supported as it delivers significant community benefit.
- In the case of Melton East, the PSP itself requires large areas to have a minimum dwelling density of 40 dwellings per net developable hectare. This will already require the delivery of small, affordable housing product.
- The Melton East PSP guidelines seek 12% affordable housing – excluding private market housing. This is now a significant issue which Council will need a framework in which to negotiate the voluntary contribution.
- At the 12% level, a developer will likely point Council to the private market housing provided to negotiate a dispensation from the VPA PSP guideline. With the VPA increasing housing densities this will become a contested issue.
- It is unclear how VCAT would interpret the PSP guideline and whether it is completely voluntary in a dispute. The level of detail in the PSP in conjunction with the objective would imply that [providing a significant response is not voluntary.
- The Development Facilitation Program (DFP) process requires a 10% AF contribution which is calculated in a specific way which is defined, and which is flexible as to how the housing is then supplied. The DFP approach does not specify the number of bedrooms or require it to be specific to social housing for example. It does exclude private market housing. The form of delivery is at the discretion / option of the developer.
- Planning Panels have valued the ability for a developer to understand the calculable value as a base position. This provides a clear framework and a base cost position for considering and comparing developer proposals. The VPA guideline is not written to allow a calculable value to be created. For example the recent C387 Geelong Panel outcome was 5% of housing at a 20% discount. In that case, the benchmark lot in that case was agreed to be a 300m2 lot.
- The VPA have not had regard to the DFP approach. Noting that the DFP provides a faster approval and the VPA approach does not. The VPA approach has also not had regard to the community benefit of a developer providing private market affordable housing at a higher rate than they would otherwise. And the PSP does not consider how the VPA guideline could be converted to a calculatable amount – for example if a cash payment was to be provided.
- The VPA approach does not consider the role that the Commonwealth and the State needs to play, as set out by SGS, in the delivery of affordable housing. It appears to place the entire burden on the development proponent.
- Development proponents are left with uncertainty and risk to the project feasibility and the negotiation over affordable housing may extend the time it takes to gain planning permission.
- The VPA approach requires Council to act as arbiter under a complex array of considerations and with insufficient guidance.

The VPAs approach for Affordable Housing in the Melton East PSP can be summarised as follows:

- The UGZ Schedule requires a written response to affordable housing and consideration by the responsible authority as to whether the permit contributes to affordable housing in a satisfactory manner.
- PSP Objective O5 is “to facilitate 12% affordable housing”. Given the objective is measurable, it provides strong guidance that permit applications must respond to.
- The PSP Guidelines:
 - Encourage permits to demonstrate how they contribute to the PSPs 12% affordable housing target.
 - Encourage the provision of affordable housing in well serviced locations.
 - Require permits to consider Table 3 affordable housing income ranges and household sizes.

Table 4 in the PSP provides that affordable housing should represent 12% of total dwellings comprising 2% subsidised market housing and 9% social housing (Council notes that this adds to 11% rather than 12%).

The PSP defines subsidised market housing to mean housing provided to persons that meet the income thresholds published in the Government Gazette.

Table 4 also seeks about two thirds of social housing to be directed to very low-income persons, 28% to low and 3% to moderate incomes.

Table 3 also seeks a high proportion of homes to be 1 bedroom, followed by 2, 3 and 4+ bedrooms.

Persons on very low incomes require access to a range of support services including health care and in particular to public transport. The VPA does not appear to have given sufficient regard to the needs generated by these persons and how they should be best located and housed with the metropolitan area (for example in public housing in a major town centre or near heavy rail).

The VPAs approach is based on a broad SGS prepared model. The SGS model acknowledges the shared responsibility for the delivery of affordable housing as shown in the SGS diagram below:

Figure 1: A shared responsibility or meeting need for affordable housing



Source: SGS Economics and Planning, 2024

Council identifies the following difficulties with the SGS approach:

- The SGS provides a very high level, and therefore somewhat crude, assessment of demand for affordable housing.
- The SGS recommendations at the PSP level do not consider the role in the delivery of affordable housing of the State and Commonwealth. This is the case, despite recognition of the role of Government being a corner stone of the SGS framework.
- The SGS approach does not consider the significant role that private market affordable housing can provide to reduce the demand for subsidized market housing or social housing over time.

At a high-level Council makes several observations:

- The Government through its own funding should provide for social housing and subsidised affordable housing to very low and low income households and by extension, the majority of 1 and 2 bedroom homes.
- The role of the developer is best directed to providing market affordable housing and market subsidised affordable housing.
- The ability of a developer to deliver market subsidised affordable housing depends on:
 - Available Government grants and or subsidies to support market delivery.
 - Whether dispensations from other regulations are available to provide a form of subsidy to private developers.
 - The extent of cross subsidy a developer can make to increase the price of the balance of home in the estate to subsidise delivery of other homes.
- Very low income persons require higher levels of support in the community, and will include relatively higher percentages of people suffering from mental and physical issues, and long term unemployed persons. People with these characteristics may be better directed to well serviced locations such as in the Melton Town Centre or other mature large town centres with good access to services and transport.

The VPA and SGS approach does not sufficiently value private market affordable housing. And the role it can play to ensure persons on moderate incomes can gain access to housing on the fringe. This provision takes pressure of the Government subsidised affordable housing.

The complex arrangements of the PSP Guidelines make it difficult to create a calculable assessment of the contribution. This is at odds for example with the DFP affordable housing contributions which are calculable, and their delivery is flexible.

The VPA approach essentially creates a significant affordable housing contribution of the type that requires a large subsidy and significant support services and which should be met by Government into the PSP. There is inadequate assistance with respect to the role of the developer or a framework for Council to realistically assess permits against.

To address these issues, Council submits that the PSP should be changed in the following way:

- O5 should be changed to:
“To facilitate private market affordable housing and encourage partnerships to deliver market subsidised affordable housing and social housing.”
- The relevant affordable housing PSP Guidelines should be deleted and changed to:
 - Residential subdivision that provides increased amounts of market affordable housing which reduces pressure for subsidised housing is encouraged.

- Residential developments should demonstrate how they have maximised the provision of subsidised market housing and social housing to the extent reasonably practicable.
- Affordable housing provision should have regard to the recommendations of the Melton Affordable Housing Strategy and the VPA Affordable Housing Report prepared in conjunction with the PSP and the SGS Report AHNAM Method Report – Greenfield, Victorian Planning Authority, 19 July 2024.”

Submission D2 – Environmental Values

Page 32 of the PSP, section G15, it mentions “a Vegetation identified in Plan 8 Native Vegetation Retention & Removal as ‘can be removed’ should be retained where possible along streets and in subdivisions, as identified in the Melton East PSP Arboricultural Report (Tree Logic, July 2022).” An arborist report, under the Guidelines for removal of vegetation, is not sufficient for approval of removal of native vegetation.

G16 - Canopy trees must not be used when bordering conservation area as it creates overshadowing which is not favourable.

Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains, are critically endangered vegetation community and is protected under the EPBC Act. Council supports the retention of the SHW as much as practicable.

Submission D3 – Public Transport Investment.

Consistent with the State Bus Plan and current and recent Infrastructure Victoria advice, accelerated investment in public transport is required to support the proposed approach to housing density, diversity and affordable housing.

Council requests that the VPA amend the PSP to include a strong statement supporting the need for the early provision of bus services in the PSP area.

The VPA is requested to amend the PSP to show a BRT link as proposed in Council’s submission to link the PSP area to heavy rail and major centres.

The Victorian Bus Plan was released in September 2023. The plan sets out a vision for the State’s bus network. The Bus Plan proposes bus related reforms. In terms of bus route planning, page 11 of the Bus Plan provides for:

- Category 1 – Rapid routes comprising Bus Rapid Transit (BRT) and Shuttle routes.
- Category 2 – Connector routes including trunk, connector and neighbourhood routes.
- Category 3 – Local routes.
- Category 4 – School routes.

A feature of the Bus Plan is to locate more frequent services on high-capacity arterial road based and direct routes with few stops. These categories of bus services are supported by neighbourhood connector routes and local routes.

The State Bus Plan and State planning policies, propose more frequent bus services where they perform a critical function within an integrated network and where they are in the form of a direct trunk route along arterial roads that provides connection to rail and major town centres, universities or other concentrated destinations.

Infrastructure Victoria (IV) have completed a comprehensive assessment of bus

planning and function and made recommendations in relation to improving bus services to assist the Government to prioritise future Budget expenditure.

The IV research, on page 24, provides:

“Currently, Melbourne’s buses arrive every 40 minutes on average during a typical weekday, extending out to every 50 minutes on Sundays.”

The IV Report, while not Government policy, provides an independent expert overview of the challenges, competing options and cost for improving bus services in Victoria. Key priorities are identified. IV recommend:

“Immediately upgrade the frequency of bus services in Melbourne, starting with trunk and connector bus routes operating in outer and new growth suburbs like Tarneit, Craigieburn, Epping, Cranbourne and Frankston.

Set minimum frequency targets for bus routes across Melbourne, based on route category. Then, deliver suitable trunk and connector bus routes for frequency upgrades in inner and middle suburbs including Point Cook, Footscray, Reservoir, Clayton.”

Figure 3: Extract from Page 11 of the State Bus Plan







NEW BUS ROUTE CATEGORIES	
Category 1	RAPID ROUTES
<p>Bus Rapid Transit (BRT) routes will deliver faster, more frequent and more reliable journeys on busy public transport corridors. They will be characterised by extensive on-road priority, premium stop infrastructure and a rail-like experience for passengers. The Doncaster Busway will be Melbourne's first dedicated busway – providing separated lanes for buses along the Eastern Freeway.</p> <p>Shuttle Routes will provide direct point-to-point service, connecting rail stations with universities and other high-demand destinations. They will be characterised by dedicated lanes and a limited number of stops with frequencies, operating hours and stop spacing carefully designed to respond to the market for which the service is being designed.</p>	
Category 2	CONNECTOR ROUTES
<p>Trunk routes will connect suburbs to key transport nodes and employment and shopping centres. Services are frequent and direct and will feature road priority measures, including bus lanes, where feasible. Trunk routes will normally operate in mixed traffic and provide greater integration with homes and destinations.</p> <p>Connector routes are the basic building blocks of urban transit. They provide easy access to the rail network as well as local employment and shopping centres. These services balance route directness with the need to provide catchment coverage of residential suburbs. Diversions are minimised to ensure competitive travel times and to attract passengers away from private vehicle use.</p> <p>Neighbourhood routes offer greater access while being as direct as possible and providing coverage. Services are low frequency and have a shorter span of hours but are often strongly patronised.</p>	
Category 3:	LOCAL ROUTES
<p>Local routes provide local access for passengers. These services are targeted to provide a minimum level of service to enable access to nearby shops and services.</p> <p>Demand responsive transport will be trialled initially in two primary contexts – areas of low demand where regular bus services might not be efficient and in growth areas where road networks are still developing and communities are in the process of settling.</p>	
Category 4	SCHOOL ROUTES
<p>School routes meet the demand spike created mostly by high school students travelling to and from school. School services can be unique routes that otherwise wouldn't generate demand.</p>	
<p>Network reform will be guided by new bus network categories that clearly define the role, purpose and function of a route within a network.</p>	

Table 2 in the IV Report is extracted and provided in Figure 4 below.

The IV report indicates that more frequent bus services are recommended to run along arterial roads to connect major travel destinations.

Figure 4: Extract from IV Report

Table 2. Bus frequency based on route categories

ROUTE CATEGORY	MORNING AND AFTERNOON PEAK		OFF-PEAK	EXAMPLE
				
Rapid routes: high speed highways of the bus network		Every 5 min	Every 10 min	Future bus routes running along the Eastern Busway
Shuttle routes: high frequency university connections from stations		At least every 10 min at all times		Route 601, connecting Monash University Clayton to Huntingdale Station
Trunk routes: arterials of the bus network		Every 10 min all times		Orbital SmartBus route 901, connecting Frankston to Melbourne Airport
Connector routes: easy access to the rail network and local activity centres		Every 15 min	Every 20 min	Route 510, providing east-west connections between Essendon and Ivanhoe stations
Local routes: the local streets of the bus network		Every 20 min	Every 30 min	Route 151, linking local residents with nearby shopping centres and services

2. In summary IV makes the following 10 overall recommendations:

“Infrastructure Victoria makes 10 recommendations to the Victorian Government to deliver a faster, fairer and better-connected bus network across greater Melbourne.

1. *Increase the frequency of bus services, beginning with outer and growth area suburbs.*
2. *Optimise the bus network through fast and direct routes.*
3. *Extend operating hours to match passenger demand and improve timetable integration.*
4. *Strengthen the role of community transport across the network.*
5. *Speed up buses through on-road priority and smarter technology.*
6. *Plan and deliver bus rapid transit across Melbourne.*
7. *Improve the bus stop and interchange experience.*
8. *Substantially reduce bus fares relative to other modes.*
9. *Update the Principal Public Transport Network to align it with existing and future mass transit bus routes to be delivered through Victoria’s bus plan.*
10. *Provide funding certainty for growth area buses.”*

In addition, the current Draft 30-year strategy prepare by Infrastructure Victoria provides the following recommendation:

*“Recommendation 10. Build a new bus rapid transit network
Complete a detailed assessment, reserve the required land, and build a new bus rapid transit network. Start with routes that connect train stations and busy destinations in Melbourne’s north, west, and south-east, and extend the new Eastern Busway along Hoddle Street.”*

These State documents are summarised to provide the basis for the VAP to amend the PSP as requested by Council.

Submission D4 – Heritage.

The VPA is requested to make specific heritage related changes to the Amendment.

Submission D4a

Council submits that there is a lack of clarity in location of heritage items. The graphic colour chosen is not contrasting enough to the residential areas hatching. For example the selection wall cannot be seen at all.

Submission D4b

Plan 2, page 13. The PSP should be changed so heritage items shown with an Asterix or drawn in solid contrast colour.

Submission D4c

Objective O19 refers to incorrect requirements and guidelines. Council request that O19 be updated.

Submission D4d

Page 27. Change O19 to refer to R45-50, not R46-51. It should reference G27-31, not G23-28.

Submission D4e

G30 refers to a document which is not available on VPA website and which the VPA states has not been endorsed for use.

Submission D4f

Page 34. The document referred to here actually will not be relevant until such time as a permit is required. The document which will assist the developer to plan for development around the wall is the Dry Stone Wall Heritage Design Guidelines.

Council requests that both documents should be referred to; one for the development of plans, the other for permit applications.

Submission D4g

page 34. Council does not want dry stone walls in shared ownership with private landowners. The PSP should be amended so the entire wall alignment is included in public land, not private. Reference to property boundary wall should be removed.

Submission D4h

Plan 6 shows the co-location of LP-09 and LP-11 with two heritage features, the Nissen hut and Fulham Park. Guideline 27 refers to adaptive reuse of these heritage places. Council seeks clarification regarding the intent of the PSP.

Submission D4i

Page 38. Council request clarification about this and whether vesting the heritage sites in Council within open space is appropriate. Adaptation of the buildings will be reliant on finding a use and in Open Space areas, this will be very difficult, before a community moves in. Council and developer/owners require more guidance about this given how this has both cost and time implications.

Submission D4j

Selection wall cross section. Page 98

OBJECTIVE 8

Balance dry stone wall protection with safety, maintenance and infrastructure delivery

- 8.1 Provide at least a 2.5m-wide landscape reserve on both sides of dry stone walls to ensure sufficient space for conservation and maintenance.
- The landscape reserves are in addition to infrastructure reserves.
 - The landscape reserves protect pedestrians from falling stone, discourage vandalism, theft and destruction.
- 8.2 Where new openings through dry stone walls are required, provide a safe distance between new wall ends and footpaths.
- Engage a professional dry stone waller to construct new wall ends and ensure the dry stone wall is structurally sound.
 - Consider the space needed for access by bikes, prams and e-mobility.
 - Pedestrian access should be planned in line with local council standards.
- 8.3 Ensure a distance of at least 2.5m between dry stone walls and underground infrastructure.
- This minimises conflict between service delivery, future maintenance and wall conservation, as well as risk of injury during any works.
- 8.4 Incorporate safety considerations in road design.
- For example: sightlines, access, impact risks, speed restriction, pedestrian and driver safety.
- 8.5 When designing roadside drainage schemes, consider surface water flow restrictions caused by dry stone walls.

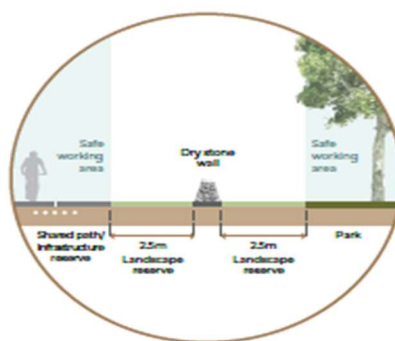


Figure 21 A distance of at least 2.5m between dry stone walls and underground infrastructure minimises safety risks during any works.

The cross section showing the selection wall does not appear to relate to the cross sections shown in documents that are endorsed by the VPA, such as the DSW design guidelines which have different requirements.

A 5m buffer to each side of a wall may not be achievable. Most developers would provide a narrower minimum width. Further consideration is required regarding the appropriate width in different circumstances.

Submission D5 - Open Space.

The VPA is requested to make specific open space related changes to the Amendment.

Submission D5a – Open Space Shortfall.

There is a considerable shortfall in the overall allocation of open space for active and passive recreation given the projected population (40,000). The area percentage basis for open space contributions typical of past PSPs, which allocates 5-7% of land to active open space, is optimised for development density of around 17 dwellings per hectare.

The density for Melton East PSP however is projected at 27-30 dwellings per hectare, resulting in a higher population that will be dependent on the 5% of active open space to be provided. The availability of substantial areas of uncredited/encumbered open space and conservation area will assist in meeting the passive open space shortfall, however optimal placement of the limited credited passive open space will be critical to this. The impact of the active open space shortfall will require other measures.

Council requests that the PSP be amended to optimise passive open spaces planning, including distribution, placement, co-location and configuration (see detailed recommendations below - Passive Open Space).

Submission D5b – Active Open Space

Council submits that access to active open space is poor in the neighbourhoods north of Tarletons Road.

Council requests that the PSP be amended to identify a future active open space in the area opposite Kororoit Creek within the future Warrensbrook PSP area.

Submission D5c – Regional Active Open Space

All of the regional active open space is shown to be credited, however 5ha is identified as 'regional', therefore no ICP/DCPs are proposed to be collected for regional land.

A recommendation of the council report of 31 July 2023 was that all of the land should be used as local active open space, thereby allowing it to be captured in the ICP. Council request that the PSP is amended to include all of the regional open space within the PSP credited open space provision so its vested is funded through the ICP.

The extent of flooding prone land within the reserve is unclear. Previously, it was understood to be quite substantial, affecting around 5 hectares (one third) of the site. More recent information sourced from Melbourne Water appears to show a significantly reduced extent of flood risk. Because critical sports infrastructure (pavilions, lights, netball courts, carparking, fencing) will have to be located outside the 1 in 100-year ARI area, the extents of this area will reduce the functional size of the reserve.

Council requests that PSP be revised to provide for the crediting of the regional open space area by referencing the Regional Active Open Space as 'Local'.

Council requests that the proposed layout of sports infrastructure, and the latest modelling of the flood-affected land extents be clarified. This will enable a more informed assessment by Council of the viability of the proposal.

Submission D5d – SR-02

SR-02. This space is shown with limited northern road frontage for the primary access, which may create access and parking constraints.

Council requests that the PSP be amended to maximise the extent of the northern road frontage and maintain an east-west orientated rectangular parcel.

Submission D5e – Passive Open Space

There is a notable gap in the walkable catchment to local passive open space coverage for the central neighbourhood, located between Leakes Road and Kororoit Creek (refer Plan 6 Public Realm, p.37).

This is proposed as a high density neighbourhood (40 dwellings per hectare), and whilst local access to the creek corridor and associated conservation areas will be highly beneficial, access to local passive open space amenities is essential.

Council requests that the PSP is amended to provide a local open space within this neighbourhood and consider suitability of co-location with the heritage site (separate co-located site).

Council requests that the PSP is amended to redistribute available passive open space to optimise access, improve urban design integration and better service the planned community.

Submission D5f – Passive Open Space – Various Changes

The following comments and recommendations are provided specifically in relation to individual local open spaces:

LP-01

The location within a planned light industrial precinct does not warrant a 1 Ha local park.

Council requests that the PSP is amended to show a much smaller space, nominally a quarter of a hectare (maximum) will suffice. The balance is to be redistributed to benefit residential neighbourhoods.

LP-02

In light of LP-01 recommendation (above), and proximity to existing native vegetation to the east, the siting of this park should be reconsidered.

Council request that the PSP is amended to relocate LO-02 further east to partly coincide with established trees immediately to the east (note: these trees are not indicated for removal by the PSP).

LP-03

A substantial part of the catchment extends into farmland (not future UGZ).

Council requests that the PSP is amended to reposition LO-03 southward, or partly consolidate with LP-04 to maximise the walkable catchment (balance distributed to cover shortfall elsewhere).

LP-06

The placement of this park relative to the adjacent activity centre and nearby drainage reserve creates awkward areas for housing development and a disjointed public realm.

Council requests that the PSP is amended to reposition and/or reconfigure the open space to achieve abuttal with, and connection between, the drainage reserve and activity centre.

LP-07

The size, configuration of this space, as well as the proposed co-location with the creek corridor is supported. Siting immediately adjacent to Tarletons Road – a proposed four-lane arterial road, should be expected to have substantial amenity impacts.

Council requests that the PSP is amended to reposition the park southward, and retain co-location with creek corridor.

LP-08 and LP-09

Smaller, awkwardly shaped spaces that are poorly situated in 'difficult to develop' locations along edge of a 4-lane arterial road, with associated amenity impacts.

Council requests that the PSP is amended to consolidate the park into a single local passive open space and reposition more centrally within the neighbourhood above Taylors (Beattys) Road.

LP-10

Space allocation is suitable, however the acute triangular configuration is awkward, and the proposed location adjacent to the Western Freeway should be expected to have substantial

amenity impacts. This outcome is partly a factor of existing road reserve constraints and the proposed street network for this neighbourhood, resulting in an overall sub-optimal urban design arrangement. The road reserve adjoining to the north does however have some potential to improve the design outcome if this area can be preserved as public land under Council management.

Council requests that the PSP is amended to reflect the outcome of a reassessment, subject to revisions to improve the proposed urban design structure – notably the street network – for this neighbourhood.

LP-11

Proposed co-location of the heritage places (nissin and quonset huts) within the open space may be appropriate if suitably sited (without unreasonable constraint to other use of the parkland), and, more critically, if suitable management arrangements can be agreed.

Retention of heritage places at the edges of the open space will also have implication for interface design (may be perceived as an issue, therefore highlighting the importance of management and maintenance arrangements).

Council requests that the PSP is amended to reflect the outcome of further assessment and discussion.

Submission D6 – Miscellaneous PSP Drafting Changes.

The identified PSP drafting changes should be made to the Amendment.

The identified PSP drafting changes should be made to the Amendment.

Submission D6a - Various Changes

Page numbers are based on PDF document and not the PSP page number.

- Page 13 – Place Based Plan – shading/colour along the freeway is not noted in the key – looks similar to light industry.
- Page 13 – Thin strip of residential development and a school in proximity of residential development (Industrial 1 Zone) is not desirable. The PSP design should be amended.



- Page 14 – PSP targets. Dwellings within 400m of local park only 82%, when the target is 95%. The PSP should be amended to increase the % performance.
- Page 24 – Road network from Taylors Road beyond the Mount Cottrell Road intersection to get to High Street is convoluted and will likely result in significant rat running. The VPA is requested to reconsider the street network to address this issue.



Submission D6b – Phone Towers

Council requests that phone tower locations be identified in the PSP. This is important to provide for adequate phone towers to service the PSP area.

Submission D6c – G45 Changes

Council request that Guideline 45 – be changed to suggest removal of "crushed rock or alternative interim provision where deemed appropriate" as Council does not support unsealed surfaces for paths used for transport.

Safe pedestrian path/s (crushed rock or alternative interim provision where deemed appropriate) from any existing pedestrian network/s to proposed connections to facilitate connectivity to services, transport, community infrastructure and adjoining communities

Submission D6d – Requirement 80

Council notes that Requirement 80 - Does not support Taylors Road extension being part of Stage 2. The VPA is requested to review R80.

R80

Until the construction of the first carriageway of Taylors Road between Beattys Road and Leakes Road at Stage 2 as per Plan 12 Infrastructure and Development Staging, subdivisions must upgrade and utilise the existing Beattys Road carriageway for access.

Submission D6e – Beattys Road

Council submits that the PSP should support the requirement to upgrade Beattys Road before Taylors Road fully connects. Consideration needs to be given to how Council can manage redundant works where Beattys Road will discontinue. Provision for removal of redundant works should be considered in the relevant ICP costs.

Council requests that the definition of upgrade be provided. For example, does "upgrade" mean rural seal and public lighting, urban seal and paths? Is the upgrade for the full extent of Beattys Road from Leakes Road to the development site at developer costs?

Submission D6f – G46

- Guideline 46 – Council request that G46 be amended to capture the need for out-of-sequence development to provide adequate transport connections to the nearest urban environment at developer costs or ICP funding if appropriate.

G46

Out-of-sequence development should only be supported by negotiation and agreement between a developer and the impacted infrastructure providers and not impose unreasonable additional burden on infrastructure providers.

Council requests that Guideline 52 – be changed to a requirement as it is a critical element to ensure a safe and functioning road network.

G52

Properties abutting the future Taylors Road should prioritise delivery of the road in the early stages of development, to the satisfaction of the responsible authority.

Submission D6h – Table Changes

Council requests that Table 23 - IN-01, IN-02 and IN-04 should be lead agency DTP/VicRoads

The following items are incorrectly labelled for interim/ ultimate construction: RD-02-03, IN-11, IN-13, IN-15, BR-02

Table 23. Precinct infrastructure

CATEGORY	PIP REFERENCE NO.	TITLE	DESCRIPTION	LEAD AGENCY	COMPONENT INCLUDED IN ICP		
					ULTIMATE LAND	INTERIM CONSTRUCTION	ULTIMATE CONSTRUCTION
Road	RD-02-03	Tarletons Road	Secondary Arterial	Melton City Council	Yes	Yes	Yes
		IN-06 to IN-07	Interim – first carriageway				
Intersection	IN-01	Melton Highway and North-South Connector Boulevard	Primary/Connector Boulevard T-Signalised	Melton City Council	Yes	Yes	No
Intersection	IN-02	Melton Highway and Mount Cottrell Road	Primary/Connector Boulevard/Secondary Arterial Cross signalised	Melton City Council	Yes	Yes	No
			Ultimate				
Intersection	IN-04	Tarletons Road and Melton Highway	Primary/Primary Cross signalised	Melton City Council	Yes	Yes	No
			Ultimate				
			Eastern leg – refer to benchmarks				
Intersection	IN-11	Taylors Road and North-South Connector	Secondary/Connector Boulevard Cross signalised	Melton City Council	Yes	No	Yes
			Ultimate				
Intersection	IN-13	Taylors Road and Paynes Road	Connector Boulevard/Secondary Arterial/Secondary Arterial Cross signalised	Melton City Council	Yes	No	Yes
			Ultimate				
Intersection	IN-15	Paynes Road and East Connector	Secondary Arterial/Connector Boulevard T-signalised	Melton City Council	Yes	Yes	No
			Ultimate				
Bridge	BR-02	Paynes Road crossing Kororoit Creek	Construction of a connector road bridge (interim standard)	Melton City Council	Yes	Yes	Yes

Submission D6i – Table Changes - Apportionment

Council has identified that the pedestrian bridges are not captured in the ICP interim works costs, but is shown as 50% apportionment to Warrensbrook ICP in Table 23.

CATEGORY	PIP REFERENCE NO.	TITLE	DESCRIPTION	LEAD AGENCY	COMPONENT INCLUDED IN ICP			TIMING	APPORTIONMENT FUNDING SOURCE	APPORTIONMENT
					ULTIMATE LAND	INTERIM CONSTRUCTION	ULTIMATE CONSTRUCTION			
Pedestrian Bridge	PED-01	Pedestrian bridge	Construction of a shared pedestrian and cyclist bridge	Melton City Council	Yes	N/A	Yes	L	Warrensbrook ICP	50.00%
Pedestrian Bridge	PED-02	Pedestrian bridge	Construction of a shared pedestrian and cyclist bridge	Melton City Council	Yes	N/A	Yes	L	Warrensbrook ICP	50.00%
Pedestrian Bridge	PED-03	Pedestrian bridge	Construction of a shared pedestrian and cyclist bridge	Melton City Council	Yes	N/A	Yes	L	Warrensbrook ICP	50.00%

The PSP and ICP should be amended to correctly identify the apportionment of the bridges to the Melton East PSP area.

Submission D6j – Planning Ordinance Changes

Schedule 6 to Clause 43.03 Incorporated Plan Overlay – the decision guidelines in section 4.0 requires minor corrects as per below.

4.0 Decision guidelines

30/07/2018

Before deciding on an application the responsible authority must consider as appropriate:

- The consistency of the use or development with:
 - *The Biodiversity Conservation Strategy for Melbourne's Growth Corridors* (Department of Environment and Primary Industries, 2013).
 - The incorporated *Melton East Precinct Structure Plan*.
 - Any relevant approval under Part 10 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth).
 - Any management plan applying to the land under an agreement under section 69 of the *Conservation Forest and Lands Act 1987*.
- *Delivering Melbourne's Newest Sustainable Communities: Program Report* (Victorian Government, 2009).
- Whether use or development protects and enhances the biodiversity an other environmental values of the site and its surrounds.
- Any impacts from the construction or operation of the use or development on biodiversity; and
- Other environmental values an the ability for the land to be revegetated or rehabilitated.

E. Infrastructure Contributions Plan (ICP) Changes.

The following ICP related changes should be made before the Amendment is approved:

Submission E1 - Address the \$145m Infrastructure Contribution Plan (ICP) Funding Shortfall.

Council has calculated that the Amendment will generate a significant financial burden to Council. The Victorian Planning Authority (VPA) is requested to change the supplementary levy to address the \$145m funding shortfall.

Council requests that the cost of ICP road, bridge and intersection projects should be increased to reflect accurate current day costs. The supplementary levy should be increased to reflect accurate current costs.

Council officers have identified funding gaps which will arise in the build out of the PSP. The estimated value of the funding gaps is summarised in the table below.

	ICP Collection	Shortfall
Community and Recreation	51%	\$51,096,269
Standard Transport	82%	\$15,822,470
Regional Sports Reserve (Land)	0%	\$19,321,500
Council Funded Project	0%	\$6,519,911
Council to Fund		\$92,760,150
Uncertain Funding (Warrensbrook)	50%	\$52,481,131
Total Gap		\$145,241,281

Based on Council's assessment to date, the ICP will impose a funding gap on Council of \$145m. Council will continue to analyse the liabilities imposed by the Amendment. To the extent possible, Council will seek to reduce its exposure to unfunded liabilities to protect its financial stability over the coming decades.

Funding this gap would require diversion of resources from other parts of the municipality to cross subsidise the growth area build out. This should be avoided, and changes should be made to the Amendment to address this issue.

The main concerns regarding the funding shortfall are:

- A funding gap will emerge from the outset of the ICPs approval and increase as the development progresses.
- The value of the funding gap is expected to escalate in real terms as has been Council's experience with other DCPs and ICPs to date.
- Council's experience has been that there is a funding gap of about 30% due to the imposition of a standard levy for community facilities and this could reach as high as 50%. While grants and other funding is available from time to time, most of the cost gap will fall to Council.
- Council's experience is that the transport projects within the Standard Levy generate a funding shortfall to be carried by Council of around 20%.
- Council is expected to fund the acquisition of land for regional sport comprising 15 hectares. This creates a funding gap of around \$19m which may increase over time as land values escalate as is normally the case.

The ICP presents Council with a cash flow dilemma for projects apportioned to other precincts. This is of concern where a project is required to be delivered to meet community expectations before funding is available from a separate precinct.

The Warrensbrook PSP has uncertain timing and significant funding is required from development within Warrensbrook to the Melton East PSP. Under the State's Greenfield Plan, the Warrensbrook PSP is expected to:

- Commence preparation in the period 2029/2030 to 2033/2034.
- There is no completion date for the Warrensbrook PSP.

However, PSPs typically take 4 years to be completed and a further two years for construction of the first stages to be complete.

Therefore, according to the Greenfield Plan, the Warrensbrook PSP may not generate ICP income until the period 3035/2036 and around 2040.

The practical implications of these funding shortfalls are:

- Council will not be able to proactively deliver ICP road projects. Development proponents will be required to deliver fit for purpose infrastructure to support their projects and if there are shortfall in the delivery of those projects, the relevant development proponent will need to meet those shortfalls.
- Council will need to scope and document the various funding shortfalls in more detail to inform Council's long term financial planning. A particular focus is required to community and recreation projects for which Council will likely deliver the vast majority of the works.
- Council will need to undertake investigations regarding risks and costs related to the delivery of large bridges over Kororiot Creek to ensure the projects are adequately funded and to remove delivery risks.
- Based on the State Greenfield Plan, projects which have funding apportioned to the Warrensbrook PSP may not be able to be delivered for at least 15 years.
- The regional open space delivery is at risk as its land acquisition is not adequately funded.

Council will engage expert assistance to review the costing information and to independently review Council's concerns. This evidence can then form the basis for more detailed submissions to the forthcoming advisory committee hearing.

Submission E2 – Specific ICP Project Changes.

The identified specific ICP related changes should be made to the Amendment.

Submission E2a

Council requests that the PSP is amended to include a requirement that prioritises Works in Kind by developers.

This will support Council's proposal to ensure developers deliver the infrastructure needed in step with their developments

Submission E2b – Infrastructure Funding

Shared paths. The PSP proposes an extensive network of off-road shared paths. The ICP makes no provision for funding of these shared paths, as is standard, however this has been shown to create infrastructure funding and delivery gaps in certain situations, such as along creek corridors. The burden is ultimately place upon Council.

Recommendation: Revise the ICP to itemise and account for the costs of shared paths in the Kororoit Creek corridor.

Submission E2c

Pedestrian bridges. The PSP proposes three pedestrian bridges of the Kororoit Creek. This infrastructure is essential to provide cross-community connections of the creek, to the function of the active transport network and for recreational enjoyment of the creek.

The PSP identifies the bridges in the Precinct Infrastructure Plan, and indicates a 50% apportionment of costs to the Melton East PSP. However, the ICP makes no provision for this funding contribution to the bridges.

Council requests that the ICP be amended to itemise and include the costs of the three pedestrian bridges.

ATTACHMENT 1: PRELIMINARY CALCULATION OF INFRASTRUCTURE FUNDING SHORTFALLS

Melton East ICP

Community and Recreation Construction Projects

Comparison between ICP cost with Community & Recreation Levy

PROJE CT ID	PROJECT TITLE & DESCRIPTION	APPORTIONMENT TO THIS ICP	ITEM	COST APPORTIONED TO ICP
ME-CI- 01	Land and construction of a Multi-purpose Community Centre co-located with the north-western local convenience centre (0.8ha),	100%	Level 1 Facility	\$9,578,066
ME-CI- 02	Land and construction of a Multi-purpose Community Centre co-located with the north-western local convenience centre (1ha)	100%	Level 2 Facility	\$11,242,831
ME-CI- 03	Land and construction of a Multi-purpose Community Centre co-located with the north-western local convenience centre (1ha)	100%	Level 2 Facility	\$11,242,831
ME-CI- 04	Land and construction of a Multi-purpose Community Centre co-located with the north-western convenience centre (0.8ha)	100%	Level 1 Facility	\$9,578,066
ME-SR- 01	Land and construction of sports fields and hard courts co-located with the north- western local convenience centre	100%	Sports and recreation facility 8 to 10 hectare site	\$13,039,821
ME-SR- 01c	Construction of multipurpose pavilion co-located with the north- western local convenience centre	100%	Sports Pavilion 2 playing areas	\$2,085,364
ME-SR- 02	Land and construction of sports fields and hard courts co-located with the northern local town centre	100%	Sports and recreation facility 8 to 10 hectare site	\$13,039,821
ME-SR- 02c	Construction of multipurpose pavilion co-located with the northern local town centre	100%	Sports Pavilion 2 playing areas	\$2,085,364
ME-SR- 03A	Land and construction of sports fields and hard courts co-located with the north- east of Kororoit Creek	100%	Sports and recreation facility 8 to 10 hectare site	\$13,039,821
ME-SR- 03Ac	Construction of multipurpose pavilion co-located with the north-east of Kororoit Creek	100%	Sports Pavilion 3 playing areas	\$3,466,792
ME-SR- 04	Land and construction of sports fields and hard courts co-located with the southern local convenience centre	100%	Sports and recreation facility 8 to 10 hectare site	\$13,039,821
ME-SR- 04c	Construction of multipurpose pavilion co-located with the southern local convenience centre	100%	Sports Pavilion 2 playing areas	\$2,085,364
Total Cost Apportioned to ICP				\$103,523,962
Total C&R levy (Capped)		\$109,088	480.6	\$52,427,693
Cost recovery by Levy				51%
Shortfall of Community Levy				\$51,096,269

Standard levy transport construction projects
Comparison between ICP cost with Std. Transport levy

PROJECT ID	PROJECT TITLE & DESCRIPTION	APPORTIONMENT TO THIS ICP	TOTAL ESTIMATED COST	COST APPORTIONED TO ICP
ME-IN-03	Primary/Connector Road Ultimate - cross signalised	100.00%	\$9,916,805	\$9,916,805
ME-IN-04	Primary/Primary Interim - cross signalised	100.00%	\$3,349,830	\$3,349,830
ME-IN-05	Primary/Connector Road Interim - cross signalised	100.00%	\$9,960,994	\$9,960,994
ME-IN-07	Secondary/Connector Road Interim - cross signalised	100.00%	\$9,928,760	\$9,928,760
ME-IN-08	Primary/Connector Road Interim - cross signalised	100.00%	\$9,928,760	\$9,928,760
ME-IN-10	Primary/Connector Road Interim - cross signalised	100.00%	\$9,643,666	\$9,643,666
ME-IN-11	Primary/Connector Road Ultimate - cross signalised	100.00%	\$9,809,188	\$9,809,188
ME-IN-12	Connector Boulevard /Connector Road Ultimate - cross signalised	100.00%	\$4,701,327	\$4,701,327
ME-IN-15	Secondary/Connector Road Interim - T-signalised	100.00%	\$6,611,153	\$6,611,153
ME-IN-16	Primary/ Connector Road Interim - T-signalised	100.00%	\$7,981,094	\$7,981,094
ME-IN-17	Primary Arterial leg extension into existing intersection Cost of construction and associated works for the fourth leg connector extension into the ME PSP	100.00%	\$4,697,817	\$4,697,817
ME-CU-01	Construction of a culvert under a 4-lane primary arterial road (interim extent)	100.00%	\$561,791	\$561,791
ME-CU-02	Construction of a culvert under a 4-lane primary arterial road (interim extent)	100.00%	\$553,844	\$553,844
ME-CU-03	Construction of a culvert under a 4-lane primary arterial road (interim extent)	100.00%	\$341,290	\$341,290
ME-CU-04	Construction of a culvert under a 4-lane primary arterial road (interim extent)	100.00%	\$1,211,988	\$1,211,988
ME-CU-05	Construction of a culvert under a 4-lane primary arterial road (interim extent)	100.00%	\$341,290	\$341,290
ME-CU-06	Construction of a culvert under a 4-lane primary arterial road (interim extent)	100.00%	\$341,290	\$341,290
Total Cost Apportioned to ICP			\$89,880,887	\$89,880,887
Total Std Transport levy (Capped)		\$147,562	501.88	\$74,058,417
Cost recovery by Levy				82%
Shortfall of Standard Transport Levy				\$15,822,470

Melton East ICP

Regional Sports Reserves Land

Melton Funding

PARCEL ID	LAND USE	AREA (Ha)	ICP CONTRIBUTION	BALANCE LAND	RATE/Ha*	LAND COST
55	Residential	2.86	1.33	1.53	\$ 1,650,000	\$ 2,524,500
56	Residential	8.68	1.23	7.45	\$ 1,650,000	\$ 12,292,500
57	Residential	3.46	0.73	2.73	\$ 1,650,000	\$ 4,504,500
Total Sports Reserve Land Value						\$ 19,321,500

* Overall 2024/2025 broad rate per Hectare for Rockbank North

Melton East ICP

External Funded Projects

Melton Funding

PROJECT ID	PROJECT TITLE & DESCRIPTION	APPORTIONMENT TO THIS ICP	APPORTIONMENT FUNDING SOURCE	TOTAL COST*	COST APPORTIONED OTHER SOURCE
SR-03b	Sports Field. Land and construction of a training field, co-located with the north-east of Kororoit Creek	0%	Melton City Council	\$ 6,519,911	\$ 6,519,911
Total Melton Funding					\$ 6,519,911

* Assumed the cost will be half of SR-03a which has double land area.

Melton East ICP

External Funded Projects

Warrensbrook Uncertain Funding

PROJECT ID	PROJECT TITLE & DESCRIPTION	APPORTIONMENT TO THIS ICP	APPORTIONMENT FUNDING SOURCE	TOTAL COST	COST APPORTIONED OTHER SOURCE
ME-BR-01	Secondary arterial road bridge, 4 lanes Provision of land and construction of a single carriageway crossing (interim treatment)	50%	Warrensbrook ICP	\$51,039,024	\$25,519,512
ME-BR-02	Connector boulevard road bridge, 2 lanes Provision of land and construction of a dual carriageway crossing (ultimate treatment)	50%	Warrensbrook ICP	\$26,254,870	\$13,127,435
ME-BR-03	Secondary arterial road bridge, 4 lanes Provision of land and construction of a single carriageway crossing (interim treatment)	50%	Warrensbrook ICP	\$14,612,331	\$7,306,166
ME-PED-01	Construction of 20m Super-T - 4m wide (Ultimate)	50%	Warrensbrook ICP	\$4,352,012	\$2,176,006
ME-PED-02	Construction of 20m Super-T - 4m wide (Ultimate)	50%	Warrensbrook ICP	\$4,352,012	\$2,176,006
ME-PED-03	Construction of 20m Super-T - 4m wide (Ultimate)	50%	Warrensbrook ICP	\$4,352,012	\$2,176,006
Total Warrensbrook Uncertain Funding					\$52,481,131