PSP 1082 & 1085

# Mt Atkinson & Tarneit Plains

## Closing Submission - C162 Amendment to the Melton Planning Scheme

September 2016

Victorian Planning Authority

**Appendix 1:** Revised Housing Requirements and Guidelines

**Appendix 2:** VPA's draft background paper: PSP Planning Response to Applied Residential Zones

**Appendix 3:** Letter from PTV regarding application of Residential Growth Zone in Mt Atkinson and Tarneit Plains

**Appendix 4:** Revised Schedule 9 to the DCPO

**Appendix 5:** Letter from APA regarding application of Mixed Use in the Pipeline Measurement Length

**Appendix 6:** Meeting File Note: Mt Atkinson and Tarneit Plains PSP- Traffic issues relating to the land north or the rail corridor in the Mt Atkinson and Tarneit Plains PSP

**Appendix 7:** Response from DELWP to Submission 13

**Submissions**

Submission 5 – Giuseppe (Joe) Nesci

Submission 6 – MSA

Submission 7 – Lilian and Mario Murga

Submission 8 – Attila Kelemen

Submission 10 – APA GasNet

Submission 11 – Niche Planning Studio (on behalf of Ray Cauchi)

Submission 12 – Niche Planning Studio (on behalf of Bestsize Pty Ltd)

Submission 13 – Beacon Town Planning

Submission 14 – Marantali Pty Ltd

Submission 15 – Metropolitan Waste & Resource Recovery Group (MWRRG)

Submission 18 – Boral

Submission 20 – Andreas Antoniou

Submission 21 – Landfill Operations

Submission 22 – Mount Atkinson Holdings

Submission 31 – Environment Protection Authority (EPA) Victoria

Submission 33 – Melton City Council

# 1. Introduction

1. These closing submissions are made on behalf of the Victorian Planning Authority (VPA), and as Planning Authority for the Amendment C162.
2. The general background and strategic basis of the Amendment are set out in the VPA's Part A submissions. This is expanded in the VPA's Part B Submission, as well as addressing individual unresolved submissions.
3. The Amendment provides for the development of approximately 6,700 new homes to accommodate an expected population of approximately 19,000 residents and, approximately 490 hectares of the Precinct will accommodate employment land for the purpose of industrial and commercial development providing the opportunity for the creation of over 18,000 jobs in a variety of sectors.
4. The Precinct covers approximately 1532 hectares of land.
5. There were 35 submissions to the Amendment.
6. 17 submitters have appeared before this panel and called evidence on landfill gas migration, traffic, airblast/vibration, planning, acoustics, ecology, drainage and infrastructure.
7. The submissions and evidence generally demonstrate a high level of co-operation and narrowing of issues between the parties.
8. VPA's list of changes was distributed on Monday 12 September 2016 during the Panel Hearing, and includes the VPA's most up to date agreed changes to the PSP.

# 2. Closing Submissions

## 2.1. Consistency of the PSP with the West Growth Corridor Plan

9. There has been a lot of discussion regarding the consistency of the PSP with the West Growth Corridor Plan. The VPA as the Planning Authority for the PSP has worked closely with state agencies throughout the PSP to ensure that the PSP comprehensively delivers the vision and strategic intent of the West Growth Corridor Plan, while responding to the site specific details that can only be addressed at the detailed PSP planning stage.

10. There have been multiple discussions regarding the policy and strategy that has led the PSP to the format that it was exhibited in, so the VPA will spare the panel further discussion of this nature. The VPA will close by saying that there has been no cogent argument against the format of the PSP by any parties and the VPA consider that the PSP has successfully responded to the vision of the corridor plan, and what's more has delivered a truly integrated precinct that will allow people to live close to where they work and play. This should be at the core of the panel's recommendation.

## 2.2. Application of the Residential Growth Zone

11. The below summarises the VPA response to Melton City Council's submission regarding the application of the Residential Growth Zone. In support of the VPA's position on this issue the following as provided in the Appendices:

- A revised FUS that shows the extent of the application of the Residential Growth Zone (Figure 1)
- Revised requirements and guidelines that relate to housing (appendix 1)
- The VPA's draft background paper: PSP Planning Response to Applied Residential Zones (appendix 2)

12. The table below is a response to each of the points raised relating to the application of residential zones in the Melton City Council's Final Submission.

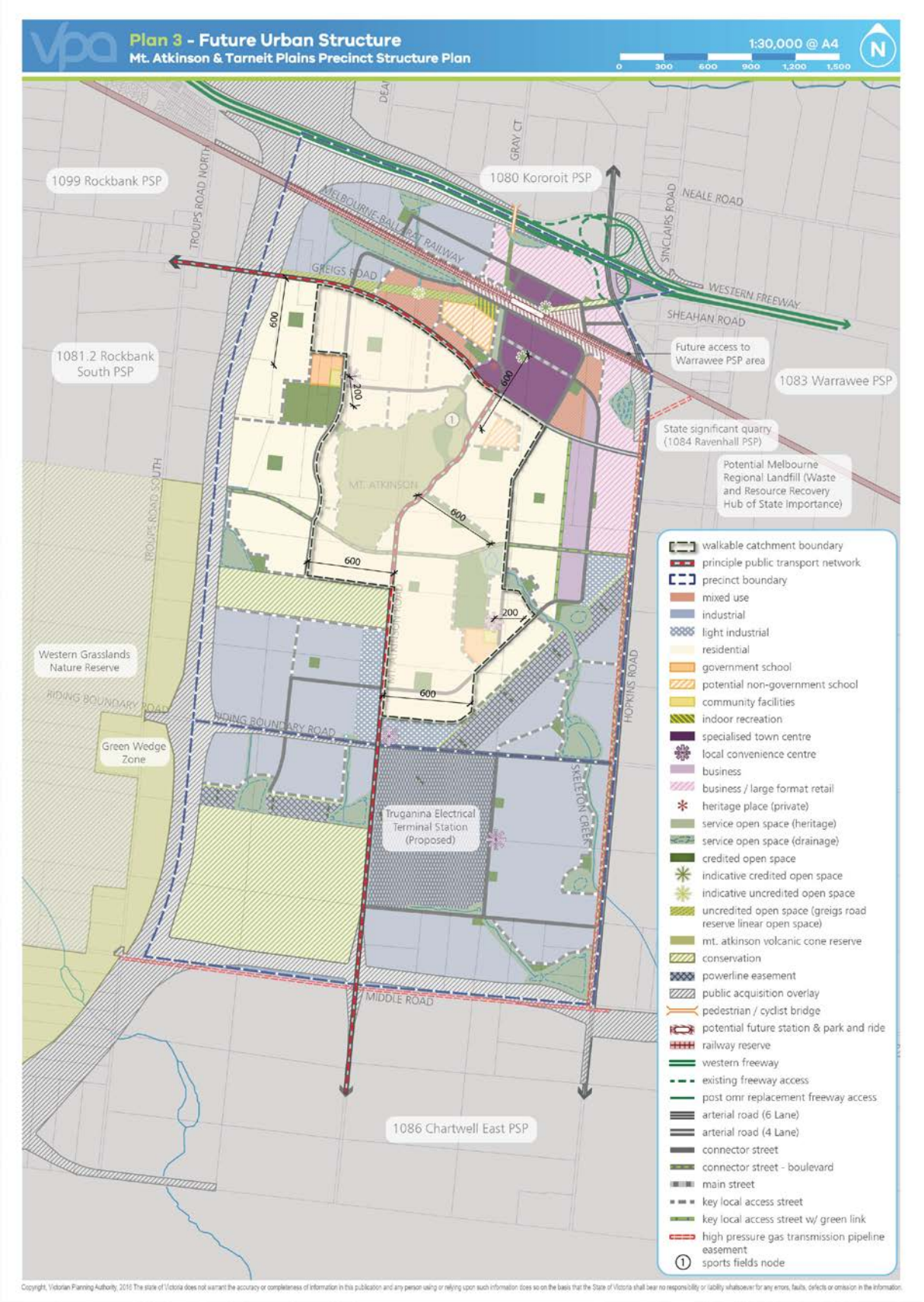


**Figure 1: Revised DRAFT FUS showing extent of walkable catchment**

<table>
<tr><th>Paragraph in MCC Council Submission</th><th>VPA Response</th></tr>
<tr><td>42-43</td><td>
Overall, Planning Practice Note (PPN) 78 is not a relevant document for greenfield planning, as outlined in more detail in appendix 2.<br><br>
However, regardless of the higher order strategic arguments in favour of an applied RGZ and the view that PPN47 and the UGZ schedule should be given weight, the use of the RGZ in greenfield areas is still considered to meet the criteria for application of the residential zones outlined in table 2 of PPN 78 as follows:<br><br>
<table>
<tr><th rowspan="2">Relevant criteria</th><th colspan="3">Applicable to:</th><th rowspan="2">Relevance to PSPs</th></tr>
<tr><th>NRZ</th><th>GRZ</th><th>RGZ</th></tr>
<tr><td>Adopted housing & development strategy</td><td>✓</td><td>×</td><td>✓</td><td>The PSP is the development strategy</td></tr>
<tr><td>Identified in activity centre structure plan / policy</td><td>×</td><td>×</td><td>✓</td><td>C1 typical zone</td></tr>
<tr><td>Brownfield / urban renewal site / area</td><td>×</td><td>×</td><td>✓</td><td>N.A.</td></tr>
<tr><td>Commercial or industrial land for redevelopment</td><td>×</td><td>×</td><td>✓</td><td>N.A.</td></tr>
<tr><td>Good access to transport choices</td><td>×</td><td>×</td><td>✓</td><td>Yes – PSP provides for this</td></tr>
<tr><td>Good access to employment options</td><td>×</td><td>×</td><td>✓</td><td>Varies</td></tr>
<tr><td>Good access to local shopping</td><td>×</td><td>×</td><td>✓</td><td>Yes - PSP provides for this</td></tr>
<tr><td>Good access to local community services</td><td>×</td><td>×</td><td>✓</td><td>Yes – PSP provides for this</td></tr>
<tr><td>Level of development activity (existing & desired)</td><td>Low</td><td>Low / Mod</td><td>High</td><td>High – PSPs are high change areas</td></tr>
<tr><td>Identified areas for growth & change</td><td>×</td><td>×</td><td>✓</td><td>Yes</td></tr>
</table>
</td></tr>
</table>

| | | | | | |
|---|---|---|---|---|---|
| | Retention of identified neighbourhood character | ✓ | ✓ | × | No established urban character and PSP addresses other character issues during urban structure development |
| | Heritage areas which impose significant constraints on increased housing development | ✓ | ✓ | × | PSP addresses this during urban structure development |
| | Existing landscape or environmental character / constraints | ✓ | ✓ | × | PSP addresses this during urban structure development |
| | Risk associated with known hazard | High | Low | Low | PSP addresses this during urban structure development |
| 44 | Amendment C157 applies to established residential areas and responds to the constraints inherent in these areas. We note also it is untested and unincorporated (as far as the VPA are aware). | | | | |
| 45 | The House Smart strategy is specific to established areas and is not relevant to the greenfield planning context. Further it alludes to the history of the primary dwelling type within Melton being detached. While this may be the case, there is no reason that this should be the driver for future planning in PSP areas some distance from established areas. | | | | |
| 46 | Contemporary structure planning seeks to provide the settings for increased housing diversity and choice over time (see Appendix 2). There is no conflict with this and the expectation that in the development of a PSP, detached dwellings may still be the dominant type. | | | | |
| 47 | While the guidance in House Smart for the application of the RGZ is laudable in an established area context, the opportunity exists in greenfield planning to provide the optimal settings by more fully leveraging off the existing and proposed facilities and transport infrastructure. Certainly guidance and evidence from PTV indicates that people are prepared to walk further to higher quality destinations and services (e.g. PPTN) than 400m.<br><br>For example the most recent VISTA data (based on average weekday public transport users for journey to work) provided by Transport for Victoria (TfV) indicates that approximately 32% of bus patrons walk 400m – 800m to their bus stop. This includes any bus stop, so it is reasonable to presume that a higher percentage of people would walk at least 600m to a high frequency bus stop such as a future PPTN service (see Appendix 3 for supporting letter from PTV). | | | | |
| 48 | The Managing Residential Development Taskforce (MRDTF) erred in not stating that the RGZ has been the predominant zone in 12 gazetted PSPs. | | | | |
| 49 | Again – the House Smart outcomes are not considered relevant to a greenfield context. | | | | |

| | |
|---|---|
| 50 | The paucity of provision of RGZ in established areas is not considered to be a suitable reason to not seek to optimise application of the RGZ in greenfield planning. |
| 51 | This quote from the MRDTF is essentially an assumption about what may happen in greenfield areas and not a planning rationale or policy – it is not considered to be relevant to contemporary greenfield planning. Further, the final MRDTF report and government response have not yet been released. |
| 52 | It is considered that the revised VPA approach to application of the RGZ is far more strategic and therefore accords to the Plan Melbourne reference to 'appropriate locations'. |
| 54-56 | It is not considered that the provisions of House Smart (or other Local Housing Strategies based on established area issues) are automatically transferable to a greenfield planning context and in particular, they don't necessarily optimise application along the PPTN routes or larger town centres with a more diverse mix of destinations. |
| 57 | VPA acknowledges that there have been a range of approaches to application of the RGZ (see Appendix 2). |
| 58-59 | The VPA considers that the guidance provided by Clause 56 has a strong level of relevance alongside the extensive list of policy references and strategic justification provided within the table provided in VPA's part B Submission (see also table within attached paper). In particular, the proposed adoption of 600m (only a 7-8 minute walk) from the PPTN is consistent with advice and evidence provided by PTV regarding appropriate walkable catchments to higher frequency transport services. Further, in the context of the higher order Plan Melbourne 20 minute city (equating to 1.6km) policy remit, the catchments developed by the VPA could be considered conservative. |
| 60 | Covered previously |
| 61 | The main catalyst for establishing the retail function of a town centre is the establishment of supermarkets and the like, which the RGZ does not accommodate. In the longer term, the variety of uses that are allowed by the RGZ will provide for a richer and more diverse urban fabric (refer paper). In any case, the RGZ only lists 'shop' as a Section 1 use (for example) where the land is within 100m of a commercial zone or mixed use zone and must adjoin, or have access to, a road in a Road Zone. The land must have the same street frontage as the land in the commercial zone or mixed use zone. The leasable floor area must not exceed 100sqm. This would therefore only apply to a small area of land in the Mt Atkinson proposed RGZ area. |

## 2.3. Mt Atkinson Specialised Town Centre & Employment Land

### 2.3.1. Application of 'Soft Caps' for shop use within the Mt Atkinson Specialised Town Centre

13. In Section 3.2.1 of the PSP, the Visions for the Mt Atkinson Specialised Town Centre establishes the purpose of the soft cap on 'shop' uses within the Town Centre:

*The purpose of the 'soft cap' on shop uses within the Mt Atkinson Specialised Town Centre is to ensure the West Growth Corridor's Activity Centre hierarchy is retained and that the core retail offering is delivered south of the rail corridor.*

14. Splitting the soft cap north and south of the rail corridor is essential to ensure the vision for the Mt Atkinson Specialised Town Centre is achieved.

15. This approach is also consistent with the objective of the Melton Planning Scheme MSS relating to retail:

    *To encourage the growth and development of vibrant and dynamic retail centres.*

16. If the soft cap was not applied as proposed in the PSP there is a risk that the core retail centre would be diluted across the extent of the town centre and fail to deliver on this objective.

17. Further, if the critical mass of the STC were delivered north of the rail, it would be further from its primary residential catchment, reducing walkability to the centre; and separated by a rail line which as yet has no grade-separated crossing.

18. It was suggested by MSA Properties (Paragraph 2.11 of the Submission) that an alternative is for the PSP to specify that the first full line supermarket must be delivered south of the rail corridor. This would not go far enough to ensure the vision of the PSP, where a Specialised Town Centre is much more diverse than simply a supermarket; and the objectives of the Melton Planning Scheme relating to retail are delivered. It would also be highly irregular for a PSP to specify this.

19. The VPA considers the application of separate soft caps relating to shop use north and south of the rail corridor crucial for delivering the vision and objectives of the PSP and the Melton Planning Scheme in relation to the Mt Atkinson Specialised Town Centre.

### 2.3.2. Application of 'Soft Caps' for restricted retail use within land designated as business large format retail

20. In Paragraph 2.18 of the MSA Submission, it was suggested that the 40,000sqm soft cap on large format retail be deleted. The Mt Atkinson and Tarneit Plains Commercial and Industrial Land Review was undertaken as a background study to the PSP. The Review discussed bulky goods retailing (also known as large format retail) in the precinct as follows:

    *This location could develop into a major regional destination for bulky goods, should it attract major regional anchor stores not currently represented in Western Melbourne such as Ikea or Costco. Without these larger stores, a precinct of up to 40,000sqm is considered possible.*

21. The background report establishes the justification of a soft cap of 40,000sqm as a reasonable amount of large format retail that would be expected in the precinct. If a major regional anchor was attracted to the site such as an Ikea or a Costco which pushes the amount of large format retail above the expected 40,000sqm, it is reasonable that the responsible authority have the opportunity to review a planning permit application when development reaches and exceeds this development scenario.

### 2.3.3. Residential Development North of the rail corridor

22. In Paragraph 5.2-5.3 of the MSA Submission, it was suggested that the ICP fund a pedestrian link be provided in the town centre over the rail corridor.

23. It is not agreed to be included as an ICP item. The primary pedestrian access across the rail corridor in the town centre will be delivered through the construction of the potential future train station. PTV have provided support to the delivery of the station and Government has announced funding to duplicate the Melton rail corridor and deliver the required rail upgrades to facilitate the future station. If the station were not delivered, it is questionable if a

pedestrian crossing across the rail would be required. It is also difficult to justify the nexus to the rest of the PSP for this infrastructure.

24. The VPA also consider providing a pedestrian connection in this location prior to development of the station as unnecessary as the provision of the station in this location is key to the amenity of the land north of the rail corridor. It is also unlikely that a level of development will occur in the interim that warrants such a large infrastructure item.

*25.* The VPA does not support residential development north of the rail corridor prior to the development of the train station and pedestrian access across the rail corridor. Schedule 9 to the Urban Growth Zone will be updated to prohibit dwellings north of the rail corridor until a pedestrian bridge or underpass connecting the northern and southern parts of the specialised town centre is operational.

26. This provision is required as access to the southern town centre and the greater precinct is fundamental to the amenity of any residential development north of the rail corridor.

#### 2.3.4. The wording of the final paragraph of Section 3.2.1 of the PSP

27. There has been discussion from a number of parties to the amendment relating to the specificity of wording of Section 3.2.1 relating to. It is proposed to reword the section in question to:

*The location of the northern town centre at the confluence of Hopkins Road with the Western Freeway and relative to the potential future train station may also support the delivery of large format specialty retail offer that has a regional catchment. A planning application would be required if the leasable shop floor space exceeds the 'soft cap' for the town centre.*

28. Regardless of the discussions had with the land holder, this wording is considered suitable as it provides strong strategic guidance for the northern part of the town centre. The characteristics of the site (location relative to the Western Freeway and Hopkins Road, the potential future train station) do make it suitable for a use of this kind subject to a planning application that meets the decision guidelines in clause 7.0 of Schedule 9 to the Urban Growth Zone (UGZ). The wording in 3.2.1 does not replace the need for a planning permit application.

## 2.4. Planning controls in response to the Quarry Sensitive Use Buffer and the Quarry Blast Buffer

### 2.4.1. Proposed Discretionary and Prohibited Uses within the Quarry Sensitive Use Buffer

29. The applied zoning within the quarry sensitive use buffer is:

- Industrial 1
- Industrial 3
- Commercial 2

30. Having undertaken a review of the Section 1 and 2 uses of each of these applied zones and the EPA Guideline: *Recommended Separation Distances for Industrial Residual Air Emissions*, the VPA has identified the uses that should be discretionary and uses that should be prohibited in the quarry sensitive use buffer. It identifies uses that are clearly sensitive uses as defined in the EPA Guideline: *Recommended Separation Distances for Industrial Residual Air Emissions* and prohibits them in the quarry sensitive use buffer. The Guideline identifies 'any land uses which require a particular focus on protecting the beneficial uses of the air environment relating to human health and wellbeing, local amenity and aesthetic enjoyment, for example

residential premises, child care centres, preschools, primary schools, education centres or informal outdoor recreation sites' as being sensitive.

31. Prohibited uses on all land within the quarry sensitive use buffer:

- Accommodation
- Child care centre
- Education centre (other than business college, employment training centre or tertiary institution)

32. Prohibited uses on Industrial 3 land within the quarry sensitive use buffer:

- Dry cleaning agent
- Laundromat
- Supermarket

33. Further interpretation has been made to make some of these uses discretionary to give the responsible authority the opportunity to grant a permit if suitable. For example it may be suitable and desirable to grant a permit within the quarry sensitive use buffer for an employment training centre in an applied industrial zone.

34. The VPA then reviewed the Section 1 and 2 uses within the applied zones and identified uses that may be impacted on by adverse amenity within the quarry sensitive use buffer. Adverse amenity impacts include emissions of noise, vibration, odour, dust and grit. From this review, discretionary uses on all land within the quarry sensitive use buffer were identified:

- Business college
- Employment training centre
- Tertiary institution

35. Permit required on land shown as business and business/large format retail:

- Dry cleaning agent
- Laundromat
- Supermarket

36. To assist the responsible authority to make a decision regarding these discretionary uses, Provision 7.0 of Schedule 9 to the UGZ establishes a decision guideline that must be met before deciding a permit application.

### Response to Boral Construction Materials submission to the Panel

37. Paragraph 94 and 102 of Boral's submission to the panel states that all uses within the quarry sensitive use buffer (QSUB) should be prohibited or discretionary based on the premise that it is not possible to identify all potential sensitive uses that are currently Section 1 uses within the relevant applied zones, so the solution is to make all uses required to apply for a permit. This is clearly onerous on the responsible authority, any referral agencies and the landholder and would result in development being stifled in a state-significant employment area in the West Growth Corridor. Most importantly it is unnecessary as the planning controls within Schedule 9 to UGZ and the PSP can identify and prohibit all clearly incompatible uses and make discretionary the vast majority of uses which are unlikely to be sensitive, but have some potential to be sensitive uses.

38. Boral also submitted in Paragraph 102 that additionally, the following uses should be prohibited: place of assembly, office and restricted retail. The expert evidence provided by Boral stipulated that 'predicted vibration levels within the QSUB can be described as strongly perceptible and "unpleasant" and therefore buildings where large numbers of people congregate, such as place of assembly, an office or large format retail shops, should be precluded before the quarry is worked out.'

39. During cross examination it was acknowledged that the calculations used to establish how far away commercial/industrial buildings (which could be more than one storey in height) need to be constructed from the planned extraction limit for ground vibration to be consistently under 25 mm/sec was well under 200 m. The standard of 25 mm/sec was the standard adopted by Earth Resources Regulation (DEDJTR) to inform the required buffer distances when the West Growth Corridor Plan was developed and are a more accurate reflection of the buffer distance required than that initially suggested by Mr Adrian Moore to the panel.

40. These calculations established that dependent on a number of factors such as rock face height, stem height, column height and explosive charge, the absolute maximum separation distance required to achieve ground vibration to be consistently under 25 mm/sec would be 165m. The 200m blast buffer is therefore considered a conservative estimate of the separation distance required to achieve ground vibration consistently under 25 mm/sec. Therefore there is no basis for prohibiting place of assembly, office and restricted retail on the basis it will be impacted on by blasting.

41. This also discounts Paragraph 104 of Boral's submission that Business College, employment training centre and Tertiary Centre are prohibited on the basis of impact from blasting.

### Response to Melton City Council's Final Submission to the Panel relating to planning controls within the quarry sensitive use buffer

42. In Melton City Council's Final Submission to the exhibited documents it was requested to amend UGZ Schedule 9 to restrict use and development as per recommendations within the Land Capability Assessment which accompanies this PSP.

43. The Land Capability Assessment undertaken by Jacobs suggested some uses that 'may not be suitable in the vicinity of the quarry such as food preparation, panel beating, paint workshops, food preparation.'

44. These were reviewed and found that many of these uses are not defined Land Use Terms in the Melton Planning Scheme and are therefore difficult and potentially confusing to apply planning controls to. Panel beating is a defined land use term, and the VPA consider it possible to address any concerns relating to impact on this use from dust and grit can be addressed at the building permit stage.

### Response to Mount Atkinson Holding's Submission to the Panel relating to planning controls within the quarry sensitive use buffer.

45. Mt Atkinson Holdings at page 23 of its submission to Panel advise that it opposes:

- A permit requirement for all development in the quarry sensitive use buffer
- The prohibition of a caretakers residence
- That building entries on Hopkins Road be oriented away from Hopkins Road
- The introduction of Notice and Appeal rights in the UGZ9
- The referral of all applications for buildings within the QSUB to the Secretary of the Department that administers the *Mineral Resources (Sustainable Development Act 1990*)

46. The VPA agree that making all development discretionary within the quarry sensitive use buffer is clearly onerous for the reasons established in response to the Boral submission above.

47. After discussion with DEDJTR, the VPA agree that a caretakers residence does not have the high amenity expectations of a standard residential dwelling, it is however a residence and should be treated as such.

48. The VPA agree that a design outcome that resulted in all structures being oriented so as to not front Hopkins Road would be a poor design outcome, and that there are alternate design options to mitigate against the potential adverse amenity impacts of the quarry. There will be a separate local road parallel to, and set back from, Hopkins Rd on which these structures are located in any case.

49. The VPA agree that the inclusion of notice and appeal rights for Boral is not necessary. By removing sensitive uses from the quarry sensitive use buffer and referring building application to the quarry regulator DEDJTR, the VPA is very confident that the majority of adverse amenity impacts can be addressed without providing Boral with notice and review rights. DEDTR have the technically and operational knowledge of the quarry to provide meaningful comment at this time.

50. The VPA contend that it is appropriate for DEDJTR to be referred building permit applications as they have the ability to provide meaningful comment at the building permit stage and by removing all of the sensitive uses and the majority of the potentially sensitive uses from the quarry blast buffer, this is an appropriate mechanism for ensuring building design responds to potential adverse amenity impacts.

### 2.4.2. Prohibition of Buildings within the Quarry Blast Buffer

51. The current wording of Specific Provision 2.10 in the revised Schedule 9 to the UGZ will be updated to read:

*The construction of a building (but not including a temporary building, a building associated with a minor utility installation or telecommunication facility, a structure, a fence and other appurtenances of a building) on land shown within the quarry blast buffer on Plan 2 in the Mt Atkinson and Tarneit Plains PSP is prohibited.*

### 2.4.3. Referrals and Notice and Review of permits within the Quarry Sensitive Use Buffer

52. The VPA retain the view expressed in Part A Submissions that applications to **construct a building** on land identified within the 'Quarry Sensitive Use Buffer' shown on Plan 2 of the *Mt Atkinson & Tarneit Plains Precinct Structure Plan* must be referred in accordance with Section 55 of the *Planning and Environment Act 1987* to the Secretary of the Department administering the *Mineral Resources (Sustainable Development) Act 1990*.

#### Response to Boral Construction Materials Part B Submission to the Panel

53. The view of Boral that all applications for the use of land and subdivision be referred to the Secretary of the Department administering the *Mineral Resources (Sustainable Development) Act 1990* is considered onerous. It is also difficult for DEDJTR to have any meaningful input at subdivision or use stage and the VPA is confident that the planning controls and the decision guideline in Schedule 9 to the UGZ result in no need to refer use applications to DEDJTR.

54. In paragraphs 120-128, Boral submitted that they be provided with notice and review rights of all applications with the quarry sensitive use buffer. The VPA do no agreed with this proposal. By removing sensitive uses from the quarry sensitive use buffer and referring building application to the quarry regulator DEDJTR, the VPA is very confident that the majority of adverse amenity impacts can be addressed without providing Boral with notice and review

rights. DEDTR have the technically and operational knowledge of the quarry to provide meaningful comment at this time.

#### 2.4.4. Suggested PSP Updates in response to the quarry sensitive use buffer

55. In Paragraph 129 and 130 of the Boral submission to Panel they have requested new requirements at 3.2.3 and an edit of R36 to require greater consideration of the quarry. New requirement - 'Allocation of land uses, building design and interface treatments must minimise potential impacts from the operation of the nearby quarry.'

56. With an appropriate design response it is considered that amenity issues can be appropriately dealt with as a building design/orientation issue. The decision guidelines in Provision 7.0 of Schedule 9 to the UGZ to be met within the quarry sensitive use buffer will adequately resolve this issue.

#### 2.4.5. The Nomination of quarry buffers on Plan 3 of the PSP and Map 1 of Schedule 9 to the UGZ

57. Boral has submitted that the quarry sensitive use buffer and quarry blast buffer be included on Plan 3 of the PSP and Map 1 of Schedule 9 to the UGZ. It is considered sufficient to show these buffers and distance on Plan 2 of the PSP. There are a number of buffers, measurement lengths and easement that impact on the PSP and to show them all on the plans suggested would make the Plans illegible. Plan 2 will be part of the incorporated document and the ordinance will reference the appropriate plan as required, so it is preferred that the representation of these items are retained as per the exhibited documents.

### 2.5. Response to the expansion of the Melbourne Regional Landfill

58. The VPA considers that PSP appropriately responds to the prospect of an expansion of the Melbourne Regional Landfill; and that no further changes to the PSP to accommodate this prospect have been justified or would be fair.

59. The PSP already responds to the prospect of an expansion of the Melbourne Regional Landfill by the proposed zoning pattern and, albeit indirectly, by the restriction on buildings within the quarry blast buffer. The former provides an appropriate amenity buffer; and the evidence supports both the existence and size of this buffer for both the northern and southern areas. The latter provides part of a buffer in relation to the migration of landfill gas; and, together with land provided on the landfill site, can provide an adequate buffer in relation to the migration of landfill gas.

60. It is common ground that the BPEM for Landfills specifies a buffer distance of 500 m from buildings, that this is in relation to the possible migration of landfill gas, and that the BPEM allows lesser buffer distance to be applied if justified by a risk assessment that considers design and operational measures.

61. The proponents of the MRL propose to establish a minimum 100m buffer on the landfill site. The evidence of Mr Kortegast supports a finding that the combination of the quarry blast buffer and the 100m internal buffer (200m in total) is sufficient having regard to the BPEM; and that no further PSP controls are required to respond to the prospect of the landfill expansion.

62. If Mr Kortegast's opinion is not accepted, and a larger buffer distance is required, then it is both appropriate and fair that this be provided on the landfill site.

63. There is no single formula for determining *who* should be required to provide a buffer between conflicting land uses. But it is possible to discern the principles that might be applied: from the Planning and Environment Act, from the Environment Protection Act, and from relevant policies.

64. One principle is the comparative impact of different buffer locations on achieving public planning objectives. This principle does not look at the equity of the outcome, but only at the public impact. It is not a principle that can be applied in isolation form other principles.

65. Another principle is the desirability that the polluter (or potential polluter) *control* the buffer land. In the case of a buffer to manage possible landfill gas migration, this is obviously important as the buffer land might be used to drill wells to manage the impact of migration if it occurs. (This is consistent with the evidence of Mr Kortegast.)

66. A further principle is the so-called "agent of change" principle – sometimes called "first-in first-served". However, in this case the application of the principle is arguable, as both the expansion of the landfill and the new PSP controls are, in reality, changes from the existing legal framework in relation to land use. The panel should reject any notion that the expanded landfill is a "given", and, as a consequence, the PSP is the only agent of change. The expansion of the landfill is still a contested matter, especially as to its configuration and extent. Moreover, there is nothing in the various policies and draft policies concerning waste to the contrary, as the support given to the expansion of the landfill in these documents is always subject to the detailed nature of the expansion being in accord with regulatory requirements (including in relation to buffers). In other words, this support would be the same even if an internal buffer of 400m was required (to provide a total of 500m with the QBB).

67. A further principle is the polluter pays principle. This principle is specifically engaged by the Environment Protection Act *and* by the Waste Management Policy for landfills. In turn, the Waste Management Policy is the principal policy engaged by the SPPF in relation to landfills. The basis of this principle is in equity. Why should someone visited with pollution (or visited with the prospect of pollution) be charged with the responsibility of dealing with it? But it is also a principle with roots in economic theory, as it is a principle seeking to internalise the economic impact of what economists call "externalities". In turn, this leads to more appropriate pricing of the polluting activity, thus discouraging pollution.

68. A final principle, which is derived from the objectives of planning in the Planning and Environment Act, is: what is fair? This principle overlaps the polluter pays principle, but is conceptually different. It is also a principle that, regardless of the objectives of planning in the Planning and Environment Act, is so fundamental to public administration that it is impossible not to give it substantial weight.

69. Applying these principles, if a buffer larger than 200 m is required to manage the potential migration of landfill gas to buildings, to require that the additional buffer be internal to the landfill site would be fair, would be in accordance with the polluter pays principle, and would provide a buffer largely in the control of the person who would be responsible for addressing any landfill gas migration. (These conclusions are consistent with the Ombudsman's' report into Brookland Green, at [1129].) As the agent of change principle is not a guiding principle in this case, the question then becomes whether the comparative impact of internalising the additional buffer (compared with imposing it on the PSP land) on achieving public planning objectives is so significant that it outweighs the application of the fairness, polluter pays, and control principles. The VPA submits that this is not the case.

70. Clearly the imposition of controls over the PSP land (beyond the QBB) in relation to possible landfill gas migration is hugely problematic. If Mr Kortegast is correct, it would also be a waste of money.

71. The Panel should accept that s 53V audits ought not be imposed by the PSP planning controls as it is not practical to undertake such audits – such a requirement would require the landowner to audit a possibility.

72. Any other controls on industrial building on the PSP in relation to possible landfill gas migration would be the equivalent of requiring the landowner to "jump at shadows".

73. At worst, the impact of some form of additional "buffer" requirements on the PSP land would be to prevent or delay development for industrial purposes. This would prevent or delay a project of State importance.

74. In any event, it has not been shown that there would be any substantial impact on planning objectives if an additional buffer of 300m, if required, was internal to the landfill. (The introduction of documents towards the end of the hearing, unsupported by expert evidence, ought be found to unpersuasive, raising more questions than are answered.)

75. First, there may be no reduction in the capacity of the proposed landfill. This capacity is influenced by the land that Boral extracts stone from and, in turn, by the economic justification of extracting stone (selling stone or creating void). If replacement void capacity is so important, then Boral could be expected to be "persuaded" to create the equivalent void by extracting lesser quality rock. (Incidentally, this would be a classic consequence of internalising an externality in accordance with the polluter pays principle.)

76. Second, there may be no reduction in the capacity of the proposed landfill to accommodate *putrescible* landfill, as solid inert landfill could be redirected to the 300m additional buffer area.

77. Third, even if there were to be a reduction in overall putrescible landfill capacity, this is not only modest but, more importantly, such a long time into the future that it ought be discounted as important. Technological change may make any such benefit irrelevant. Behavioral change may make the benefit less significant.

78. Fourth, the case that there may be a gap that delays a stage of the landfill for a few years is weak. (There are obvious actions that Boral and the landfiller can take to deal with this.) But even if there were a gap, this is not a major impediment of State planning objectives. During any such period the gap could be made good by other facilities.

79. Hence, the Panel should conclude that the comparative impact of internalising any additional buffer (compared with imposing it on the PSP land) on achieving public planning objectives is not so significant that it outweighs the application of the fairness, polluter pays, and control principles. Rather, the Panel should conclude that the PSP provides appropriate controls in relation to the future expansion of the landfill; and that any further controls that are necessary should be imposed on the landfill site itself.

## 2.6. Infrastructure Contributions Plan

### 2.6.1. ICP Timing and the application of the interim Development Plan Contributions Overlay

80. In Paragraph 154 of their submission to Panel, Melton City Council submitted that the PSP should be delayed until the ICP Framework is finalized. The VPA do not consider it necessary to delay the gazettal of the PSP.

81. An interim arrangement (Schedule 9 to the Development Contributions Plan Overlay) to allow an agreement with the responsible authority to be entered into prior to establishment of a precinct wide contributions plan. This is considered appropriate as the PSP establishes the strategic justification for the infrastructure items and the ICP is the mechanism for delivering the infrastructure. It is acceptable that an agreement act as a substitute for the infrastructure delivery mechanism in the interim. The fact that the majority of the precinct is in the control of one landholder will also minimise the risk of the responsible authority having to enter into agreements with multiple parties.

82. Melton City Council expressed concern with the wording of Schedule 9 to the DCPO. The VPA's response is attached as Appendix 4.

83. The funding of infrastructure in this instance is distinct from the situation at the Donnybrook Woodstock PSP, where it was more difficult to administer 173 agreements for land development as the land was included in two Municipalities.

## 2.7. The High Pressure Gas Transmission Pipelines

### 2.7.1. Sensitive Uses

84. In Paragraph 2.1 of APA's Submission to the panel, it recommends a permit requirement be included in the UGZ9 for the following sensitive uses: Accommodation (other than single dwelling), dependent persons unit, residential aged care facility, child care centre, education centre, place of assembly, retail premises, cinema based entertainment facility, service station, corrective institution or hospital.

85. The VPA agreed to the above uses being discretionary in the high pressure gas transmission pipeline apart from accommodation and retail premises.

86. A permit requirement for retail premises has not been included as requested by APA because the VPA does not consider it should be categorised as a sensitive use (in terms of high pressure gas transmission pipelines) as it is an extremely broad ranging land use category, the majority of which do not generally result in large numbers of people congregating that would have difficulty escaping the area without assistance (in contrast to the other pipeline 'sensitive uses'). The VPA also considers that restricting otherwise 'as of right' uses in a business/large format retail area is counterproductive to facilitating development for no discernable reason, and when the APA has not objected to this use as such.

87. The VPA do not agree with making accommodation permit required as this is overly onerous. Notice must be given to APA for an application for residential development of four or more storeys within the high pressure gas transmission pipeline measurement length. This is considered appropriate as accommodation is a discretionary use in the mixed use zone so a use permit for higher density development will be required.

### 2.7.2. Notice Provisions

88. APA requests 66.04 be amended to include a referral similar to the Quarry Sensitive Use Buffer (i.e. Pipeline Sensitive Use Buffer): A referral to Energy Safe Victoria or the Secretary or Minister to the Department administering the Victorian Pipeline Act, 2005 (determining authority) for an application for subdivision and construction of a building to be used for sensitive use as defined in AS2885 within the Measurement Length of the high pressure gas transmission pipeline shown in the PSP. Sensitive land uses include: Accommodation (other than single dwelling), dependent persons unit, residential aged care facility, child care centre, education centre, place of assembly, retail premises, cinema based entertainment facility, service station, corrective institution or hospital. The purpose of this provision is to ensure that prior to the commencement of any of the said uses, consideration is given to the safety of locating the use nearby to the gas transmission pipeline.

89. The VPA consider that the schedule has been drafted to require notice rather than referral of the listed sensitive uses within the 'measurement area' to be given to APA. APA have the ability to comment on the proposal at this stage if there are concerns regarding the use. When referring an application (both to a recommending and determining referral authority), referral authorities must be provided with a copy of the application material, can ask for further information, must keep a register of applications publicly available, must consider every application it receives and may object or may give comments in relation to the application.

This imposes an administrative burden on all parties which is reduced through the option of giving notice instead, while not reducing the degree to which Council takes APA's comments into account. Should a recommending referral authority object to an application or recommend conditions of approval be included, the responsible authority still has the discretion to decide whether to do so or not.

90. The response from a recommending referral authority, an objection to an application or recommended conditions to include following notice does not determine the application and the responsible authority can exercise their discretion when making a decision.

91. The Referral and Notice Provisions Practice Note 54 indicates that a response from a recommending referral authority has no more weight than a response to notice (an objection or conditional support). However, the formalities of these processes differ as described above.

### 2.7.3. Provision 2.7 of Schedule 9 to the UGZ

92. Following discussion with APA on the 23 of September 2016, the VPA acknowledge that is possible and preferable to nominate the area in which a construction management plan that responds to the high pressure gas transmission pipeline is required. The VPA are willing to discuss this recommendation with APA, and hold the view that the responsible authority must be satisfied that APA has reviewed and approved the construction management plan. This view was supported in the recent Donnybrook Woodstock PSP Panel Report.

### 2.7.4. Requirement for a revised Safety Management Study (SMS)

93. The VPA agree with APA that a further SMS is not required due to the minor changes in land use provision since the initial SMS was undertaken. The VPA consider that the applied zone in this situation is irrelevant as the potentially sensitive uses within the measurement length have been made discretionary.

### 2.7.5. Mixed Use Zone in the Measurement Length

94. In Paragraph 16-35 of Melton City Council's submission to Panel, concerns were raised regarding the suitability of the applied mixed use zone in the measurement length. Paragraph 28 identified the Section 1 uses in the zone that are of concern.

95. The VPA have addressed these concerns by requiring a permit for the potentially sensitive uses set out in Paragraph 28. The issues here is the uses, not the applied zone. By requiring a permit for sensitive uses, it makes the zone in which they occur irrelevant.

96. There was also a concern regarding the objective of the Mixed Use Zone: 'to provide housing at higher densities'.

97. Schedule 9 to the UGZ identifies that: Notice must be given to the person or body listed in the Schedule to Clause 66.06 of an application for a residential development of four or more storeys within the 'high pressure gas transmission pipeline measurement length.

98. The VPA consider that the advice provided by APA in letter dated the 29 of August still stands (see appendix 5).

## 2.8. Traffic and Transport

### 2.8.1. Access to land north of the rail corridor

99. The minutes of the meeting held between all relevant parties to discuss the access arrangement to land north of the rail corridor are attached as Appendix 6. These minutes are agreed and the issue is considered resolved.

### 2.8.2. Railway Noise Attenuation

100. Mr Jim Antonopoulos from SLR, providing expert evidence on behalf of MAH expressed an opinion that the 65dB$L_{Amax}$ is not likely to provide acceptable amenity for sleeping areas and that it is reasonable to provide amenity limits for living areas. He recommended indoor noise limits of 55dB$L_{Amax}$ for bedrooms and 60dB$L_{Amax}$ for living areas.

101. It is acknowledged that there have been numerous VCAT decisions for example Richmond Icon Pty Ltd v Yarra CC & Ors [2013] VCAT 493, and Lazzcorp Brunswick Pty Ltd v Stonnington CC & Ors [2002] VCAT 889, that have resulted in the proposed noise levels being implemented.

102. The VPA view is that the Minister for Planning's directions to local councils to use specified internal noise limits of 60dB$L_{Amax}$ for bedrooms and 40dB$L_{Amax.}$ These levels have translated through to the Melton Planning Scheme in Schedule 3 to the Design and Development Overlay, Schedule 8 to the UGZ (Paynes Road PSP) and should be implemented in this case.

### 2.8.3. Additional SIDRA analysis and Town Centre Carriageway Width

103. In response to Paragraph 71-73 of the Melton city Council Final Submission, the VPA do not believe a SIDRA analysis is required for these intersections. The modelling assessment shows that there is sufficient capacity in the ultimate road network on this part of the network. Council's submission appears to be based on the perception of increased traffic using Riding Boundary Road to access the OMR, but this is not supported by the modelling assessment.

104. In response to Paragraph 259-263 of the Melton city Council Final Submission, the VPA support the use of narrower carriageways to create a low speed environment in town centres. Drivers may slow down when they feel the space they are travelling in is narrow or its width changes. The VPA consider that carriageways should with be 3.0 metres or less to prevent traffic 'squeezing past' cyclists. 3.0m would allow for cyclists to retain priority on the carriageway, provide enough width for buses to use if required and would contribute towards the creation of a safe, low speed environment.

## 2.9. Development Services Scheme

105. Submitter 13 has made a submission that proposes relocating WI-09 to alternative locations. Melbourne Water have previously provided a response which are included in the VPA Part B Submission.

106. The submitter has proposed relocating the WI-09 into conservation Area 7. This has been referred to DELWP who provided the following response:

*The identification of Conservation Area 7 in the Biodiversity Conservation Strategy (BCS) is based on estimated data as DELWP was not able to obtain access to undertake relevant threatened species and vegetation surveys. The BCS identifies that flora and fauna surveys are to be undertaken within Conservation Area 7 to allow for determination of its management category. DELWP has not yet been able to obtain consent from the land owner to undertake surveys.*
*The Biodiversity Area Assessment Report undertaken for the GAA in 2009 by BIOSIS was not*

*able to obtain access to the subject site however identified that based on reconnaissance surveys it is highly likely to comprise grassy native vegetation.*
*Based on current biodiversity information available (in the absence of field surveys) DELWP does not support the concept of locating a retarding basin within Conservation Area 7. This use and development is considered inconsistent with the objective of the conservation area as outlined in the Biodiversity Conservation Strategy (BCS)) which is which is the 'protection of high quality native grassland that contains high persistence habitat for Golden Sun Moth and Spiny Rice-flower within a practically manageable area'.*
*It is noted that the consultant providing advice in regard to the retarding basin concept has also not been able to access Conservation Area 7.*
*DELWP's planning regarding future management of the conservation area and determination of suitable land uses will be based on on-ground vegetation and species surveys conducted in accordance with DELWP's Timestamping standards.*

107. The email response from DELWP is provided in Appendix 7.

# 3. Summary

Review of the submissions made to the Mt Atkinson and Tarneit Plains PSP shows support across State Government and all associated key agencies.

The VPA is appreciative of the high level of cooperation it has received from landowners and stakeholders.

The VPA commends the Amendment to the Panel.

Stuart Morris

Adele Patterson

Ben Hawkins

For Victorian Planning Authority.

# 4. Appendices

**Appendix 1:** Revised Housing Requirements and Guidelines

# Mt Atkinson and Tarneit Plains PSP

**Housing - Proposed / Modified Objectives, Requirements and Guidelines** 26/09/16

| | **Mt Atkinson**<br>(proposed revised as at 260916) |
|---|---|
| **Objectives** | |
| | Deliver a minimum of 7,500 new homes across the Precinct and promote increased housing choice and density within a walkable catchment of high amenity features and public transport. |
| **Requirements** | |
| | Subdivision of land within walkable catchments shown on Plan 5, which typically comprise residential land within:<br><br>• 800m of the Train Station<br>• 600m of the retail core of the Specialised Town Centre<br>• 600m of the Principal Public Transport (bus) Network routes,<br>• 200m of community hubs and local convenience centres;<br><br>must create lots suitable for the delivery of medium or higher density housing as outlined on Table 2, and achieve a minimum average density of 20 dwellings per hectare.<br><br>Applications for subdivision that can demonstrate how target densities can be achieved over time, to the satisfaction of the Responsible Authority shall be considered." |
| | Subdivision applications must include layouts for any lots identified for future development of medium density, high density or integrated housing that suitably demonstrate:<br>• Potential dwelling yield<br>• Active interfaces with adjacent street, open space and waterways<br>• Safe and effective internal vehicle and pedestrian circulation<br>• The delivery of dwelling diversity and lot sizes<br>• Servicing arrangements<br>• Treatments for sensitive interfaces. |
| **Guidelines** | |
| | Residential subdivisions should provide a broad range of lot sizes capable of accommodating a variety of housing types as described in Table 2. |

**Appendix 2:** VPA's draft background paper: PSP Planning Response to Applied Residential Zones

# PSP Planning Response to Applied Residential Zones

## Background Paper

September 2016

## Contents

# 1 INTRODUCTION

As Melbourne heads towards a population of around 8.1 million by 2050, it is important that greenfield growth areas have robust planning in place that delivers the liveability outcomes we desire alongside the ability to adapt to changing circumstances through new types of housing and activity.

The contemporary planning of these areas through Precinct Structure Plans (PSPs) enables a physical urban structure and statutory planning framework that provides, not only for high quality and liveable communities throughout the initial development phase, but also provides the setting for ongoing change and evolution of the urban environment in the longer term. This ensures that these communities have the capacity to fully embed the higher order strategic directions for our city.

One of preferred mechanisms used by the VPA over the last few years, as part of a suite of planning tools to achieve the above, has been the broad application of the Residential Growth Zone (RGZ) through the Urban Growth zone schedule, for residential areas within some of its PSPs. This more extensive approach to applying the RGZ has been significantly influenced, by Plan Melbourne's (2014) reference to the use of the Residential Growth Zone in Greenfield areas.

Prior to 2014, most MPA led PSPs applied the General Residential Zone (GRZ) and its predecessor the Residential 1 Zone, as the default zone. As a result, historically there has been a more limited application of zones that facilitate higher density development such as the RGZ and / or MUZ. Overall, the approach to applying zones through the UGZ schedule has been developed mostly on a PSP by PSP basis which has led to a range of approaches.

To date, the RGZ has been applied across the entirety of ten PSPs[1], and predominantly within two[2]. Development has commenced in a number of these precincts, and by all accounts is proceeding in accordance with the PSP as expected. More recently, the RGZ has been the default applied residential zone to all PSPs that have been referred to Planning Panels Victoria. This approach, however, has met with some opposition, primarily from local councils, which have in turn generally been supported by the relevant panels.

Following these recent panels, the VPA has undertaken a review of its approach to application of residential zones in PSPs and is now proposing a more nuanced, strategic and consistent approach to guide future amendments, while still seeking to optimise the application of the applied RGZ.

This paper therefore outlines the strategic merit for utilisation of the applied RGZ in greenfield PSPs, as well as improved guidance regarding where and how it should apply.

[1] *These PSPs are Ballan Road, Westbrook, Riverdale, Truganina, Tarneit North, Clyde Creek, Thompsons Road, Clyde Creek Extension, Berwick Waterways and Thompsons Road.*

[2] *These PSPs are East Werribee and Black Forest Road South*

# 2 POSITION SUMMARY

## THE ROLE OF PSPS IN GUIDING DEVELOPMENT

The primary purpose of PSPs is to guide the initial development phase of previously undeveloped (greenfield) land. However, once the initial development phase is complete, the basic physical structure set by PSPs (transport networks, town centres, open space systems, community facilities etc.) is likely to be in place for hundreds of years.

Consequently, the MPA contends that the planned urban structure provided in PSPs also provides a strong foundation to enable adaptation, change and renewal of these urban areas well into the future. Providing the appropriate setting for future change is considered to be particularly important, as we have seen how difficult it is to influence or change community expectations in many existing urban areas, even though there may be considerable strategic merit.

One of the mechanisms to facilitate this adaptability is via the use of the applied RGZ through the UGZ schedule that implements a PSP, and the MPA contends that application of the RGZ is the best zone for the purpose in many greenfield planning circumstances.

Some of the high level reasons for this are that use of the RGZ:

- Will encourage increased housing diversity, choice & employment opportunities that is responsive to community needs.
- Provides flexibility for future land uses in new suburbs & encourages renewal to continue attracting re-investment & residents.
- Provides the settings to facilitate increased employment choice and increase opportunities for a richer, more vibrant and resilient urban fabric.
- Assists in facilitating ultimate housing densities that can make the 20 minute neighbourhoods a reality in greenfield areas.
- Will assist in the full leveraging of the integrated urban structures and infrastructure now being provided in contemporary greenfield planning, beyond the initial development phase.
- Signals to communities that urban environments are dynamic and evolving and provides Councils with the scope to translate and manage zones in the future.
- Strengthens the concept of a permanent urban growth boundary (more effective use of land near edges).
- Is consistent with the overall Plan Melbourne (2014) & emerging Plan Melbourne Refresh objectives.

## PROPOSED GUIDANCE FOR APPLYING THE ZONES

***The following provides guidance regarding how zones should be applied and how relevant PSP objectives, requirements, guidelines and plans should be prepared to ensure compatibility.***

The amount of applied RGZ should be optimised through a strategic approach using a range of criteria, and with some flexibility depending on local circumstances. The ultimate outcome would normally be a combination of RGZ & GRZ across PSPs with applied zone locations tailored to implement PSP objectives, requirements, guidelines and plans.

To determine the applied residential zoning the following guidance criteria and process should be used:

1. Identify higher accessibility areas as determined by walkable catchments to key amenity features, activity hubs and public transport:
    - 800m of train stations (centroid or boundary)
    - 800m of major town centres (perimeter of retail / commercial core)
    - 600m of specialised town centres (perimeter of retail / commercial core)
    - 600m of the Principal Public Transport Network (PPTN) (centreline).
    - 400m of local town centres (perimeter of centre)
    - 100-200m from co-located, community hubs, sports reserves (apply discretion depending on the type, configuration and function of the hub.
    - 100-200m from Local Convenience Centres (apply discretion depending on size and function of the LCC, as these can vary significantly).

2. Refine / finalise boundaries by:
    - Removing constrained areas (e.g. will vary from PSP to PSP but could include areas of steep topography, high pressure gas pipelines, significant vegetation, sensitive waterways / interfaces etc.) and / or;
    - Making sensible adjustments (extensions and / or reductions) to avoid odd outcomes / difficult to administer slithers etc.
3. The area contained within the walkable catchments will then be identified as RGZ, while constrained and / or remaining areas outside catchments would be identified as GRZ. Rarely, NRZ could apply to some of the constrained / remaining areas should there be highly specific matters that need addressing (such as interfaces with highly sensitive adjoining land uses).
4. Plan 2 (Future Urban Structure) and potentially Plan 5 (which depicts more specific guidance regarding housing outcomes) will identify the walkable catchments. Plan 5 may also specify additional areas in the immediate vicinity of key precinct features where medium and high density is required to be prioritised as part of initial PSP development.
5. Table 1 of the schedule to the Urban Growth Zone would contain a reference to the RGZ applying to areas within a walkable catchment of high amenity features and public transport as shown on plans 2 and 5 of the PSP.
6. The PSP will contain a suite of objectives, requirements and guidelines to guide appropriate housing outcomes in the PSP development phase, and these will also reference the walkable catchments where relevant.

# 3 THE STRATEGIC BASIS FOR APPLYING THE RGZ

The MPA sees a strong overarching strategic basis for its revised approach to applying the RGZ in greenfield growth areas. The approach is consistent with Plan Melbourne / Refresh as well as being compatible with well accepted principles for delivering compact, liveable and vibrant communities.

## ENABLING INCREASED CHOICE AND DIVERSITY

***New Suburbs should provide the settings to facilitate increased housing diversity choice; provide the flexibility for future urban change and renewal; provide the settings to facilitate increased employment choice and increase opportunities for a richer, more vibrant and resilient urban fabric.***

### Flexible neighbourhoods

An increasingly important objective for new suburbs is the ability to provide flexible and responsive neighbourhoods, with appropriate employment opportunities woven throughout and / or adjoining residential areas. The new suburbs of today will become established suburbs within a generation. The demography of these areas are expected to change as households mature, and communities evolve with broader social and economic trends.

However, the ability for communities to adapt and evolve with new forms of housing and commercial enterprise will be influenced by a range of factors, especially the land use controls that apply at the time.

The popularity of inner city areas is in large part due to their wide range of features and amenities such as flexible retail strips, jobs, diverse buildings, and clustering of different but compatible activities that provide options for local communities and are responsive to changing needs. These areas also comprise considerable variation in land use types and sizes.

On the other hand, the concept of traditional outer suburbs that consist of homogenous dwellings and lot sizes with segregated land uses, confined retail destinations, and poor connectivity and integration, is no longer acceptable and limits potential for future regeneration and renewal.

When suburbs fail to respond to the changing needs of residents and businesses the vibrancy and growth potential of an area can be stifled, leading to stagnation or decline and a range of other social and economic costs.

For example, the Grattan Institute has found that unnecessarily restrictive zoning is a crucial barrier to change, and may not actually protect residents from perceived 'undesirable' activities. Rather, it could exclude activities that would benefit a local area, increase the cost of land, and impose a substantial compliance burden on residents and businesses. They also contend that the impact of exclusion through zoning can reduce adaptability by only allowing a narrow range of building types and activities in a specific area.[3]

Further, research led by Billie Giles-Corti determined that the three key factors used to measure the walkability of a neighbourhood were the presence of shops and jobs, along with density and connectivity of street networks. The research found that more destinations, higher densities and permeable streets led to healthier lifestyles and community wellbeing. Zoning controls have a direct impact on all these elements, save for the street network.[4]

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[3] *Jane-Frances Kelly & Peter Breadon (2012), Tomorrow's Suburbs: Building Flexible Neighbourhoods, Grattan Institute*

[4] *Melanie Lowe, Carolyn Whitzman, Hannah Badland, Melanie Davern, Lu Aye, Dominique Hes, Iain Butterworth, Billie Giles-Corti (2015) Planning Health, Liveable & Sustainable Cities: How can indicators inform policy?,*

Research from the Grattan Institute also indicates that the reliance on accessing employment from a centralised (e.g. Melbourne CBD) area is unhealthy in terms of resultant commute times and expensive in terms of the infrastructure required and the unproductive travel time.[5]

Plan Melbourne (2014) reinforces this concept of housing diversity for growth areas by stating:

> *"To accommodate a changing population and to assist affordability, a range of housing types need to be provided in Melbourne's newest suburbs. There needs to be a move away from uniform-sized housing lots towards provision of both higher and lower densities within each new precinct. This can be achieved through both larger suburban lots (to provide a sizeable backyard for those families that desire it), as well as options for low-rise apartments close to shopping centres and community facilities"[6].*

As well as:

> *"All structure plans and housing strategies (already approved and yet to be-done) will need to demonstrate how they will deliver a greater diversity of housing, attract more jobs and help deliver the 20-minute neighbourhood".[7]*

### Use of the RGZ

While spatial planning cannot be expected to resolve all of the issues outlined above, it does have an important role.

New suburbs should create the scene for stronger and evolving communities. As a residential zone, the RGZ provides for more flexibility and diversity in comparison to the GRZ and NRZ. The NRZ seeks to limit change, with a maximum number of dwellings per lot and a height limit of 8m. The GRZ has more flexibility, but development still needs to accord with the purposes of ResCode, and respond to established neighbourhood character which limits the potential for future change once a PSP is developed.

In comparison the RGZ encourages a diversity of housing types (from larger detached homes to smaller low-scale apartments), while also allowing for more complementary as-of-right, commercial uses that could provide for more jobs and community services (such as food and drink premises, shops, medical centres, B&Bs, and migrant services). Easy access to a greater range of jobs and other destinations in proximity to where people live will reduce commute times and reduce pressure on the broader transport network.

Both the PSP guidelines and Plan Melbourne (2014) reinforce the importance of and need for housing diversity and choice and the role of applied zones in contributing to this outcome. In particular, the PSP guidelines recognise the role played by the schedule to the UGZ by asking the following question:

> *"What provisions are included within the schedule to the Urban Growth Zone to facilitate housing diversity?"[8]*

While Plan Melbourne (2014) also includes a specific direction for the MPA to:

> *"Encourage use of the Residential Growth Zone in Melbourne's greenfield locations in growth areas to allow for residential change and redevelopment in appropriate locations over time."[9]*

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*University of Melbourne and Carolyn Whitzman, Melanie Davern, Lu Aye, Iain Butterworth, Dominique Hes, Billie Giles-Corti (2014), Urban Liveability: Emerging lessons from Australia for exploring the potential for indicators to measure the social determinants of health, University of Melbourne.*

[5] *Jane-Frances Kelly (2013), Renovating Housing Policy, Grattan Institute.*

[6] *Plan Melbourne 2014, initiative 2.1.4*

[7] *Plan Melbourne 2014, initiative 2.2.3*

[8] PSP Guidelines, 2009, Part 2, Element 2, Q6.

[9] *Plan Melbourne 2014, Initiative 2.1.4*

If the RGZ is not applied up-front in appropriate and higher amenity locations, then future rezoning is likely to be a complex, daunting and contentious process, as is being demonstrated in many established parts of Melbourne. Alternatively, early application of the RGZ provides the correct tool to complement the range of destinations and the integrated and walkable physical structure contained within current PSPs. This approach will also provide the setting to deliver rich, dynamic and liveable suburbs with multiple attractive local destinations and more local business and job opportunities.

## FACILITATING THE PERMANENT URBAN GROWTH BOUNDARY

***The policy of a permanent urban growth boundary should be realised in an enduring way, and not just in the short to medium term.***

One of the key tenets of Plan Melbourne 2014 and the emerging Plan Melbourne Refresh (2016) is the concept of a permanent Urban Growth Boundary for metropolitan Melbourne. To achieve this, while also supporting Melbourne's growth to 2050 and beyond, will require a variety of initiatives from across government.

Plan Melbourne (2014) states:

> *"A permanent boundary will provide a clear policy signal about long-term development options and protect the values of non-urban land, opportunities for productive agricultural land and significant landscapes".*[10]

The Plan Melbourne Refresh Discussion Paper states under 'Growth Challenges, Fundamental Principles and Key Concepts':

> *"The existing urban growth boundary will be locked down and the values of the green wedge and peri-urban areas should be better articulated".*[11]
>
> *It also states:*
>
> *"Retaining the urban growth boundary (UGB) and making it permanent has bipartisan support. Plan Melbourne 2016 will reaffirm the importance of the UGB in managing Melbourne's growth and will state that it will be 'locked down'. This will provide greater certainty and help create a more compact, contained and sustainable Melbourne.*
>
> *Directions relating to the UGB will be retained in the State of Cities chapter in Plan Melbourne 2016 to reinforce its importance for protecting rural and non-urban areas and modified to clearly state that the existing UGB will be 'locked down"*[12]

Many benefits will stem from the creation of a permanent urban growth boundary, including:

- Providing certainty to the community, development industry and government, which in turn will enable better community, transport and service infrastructure planning as well as less speculative pressure on land outside the UGB.
- Preserving the role and function of agricultural and environmental land abutting and / or near the UGB that feeds, services and provides recreation options for Melbourne's residents.
- Enabling more cost effective and efficient use of installed infrastructure over time, particularly through delivery of more viable and frequent public transport services.

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[10] *Plan Melbourne 2014, page 161*
[11] *Plan Melbourne Refresh Discussion Paper, page vi, key points*
[12] *Plan Melbourne Refresh Discussion Paper, page 13, Containing urban growth*

- Providing the right economic signals and incentives to facilitate the investment that will create a more compact and liveable city.

Greenfield planning not only contributes to the achievement of a permanent urban growth boundary at the time of initial development, but can also support and provide the flexibility for the transformation and renewal of these areas as they mature and become part of 'established' Melbourne.

This is a very important consideration. Based on anticipated dwelling and population growth rates (VIF 2016), the current greenfield growth corridors of Melbourne will be built out around 2050. The term 'permanent' will mean nothing unless we provide the right planning settings to facilitate increased residential densities, diversity and urban change as we approach that time.

## DELIVERING THE 20 MINUTE CITY

***The concept of a 20 minute city (made up of compact 20 minute neighbourhoods) should include the entire metropolitan area.***

Plan Melbourne (2014) introduced the concept of a city of 20 minute neighbourhoods as follows:

> *"Plan Melbourne aims to create a city of 20-minute neighbourhoods where people have safe and convenient access to the goods and services they need for daily life within 20 minutes of where they live, travelling by foot, bicycle or public transport. This includes a variety of housing choices, shops and commercial services, schools, parks and recreation opportunities and good walking and bicycle infrastructure.*
>
> *Many areas of Melbourne already offer a 20-minute neighbourhood experience. They have the three critical factors in place: sufficient population to attract businesses and services, a good walking environment and a centre to which people are attracted…"*[13]
>
> and
>
> *"The 20-minute neighbourhood is about living locally. It is about the way we plan and develop areas at the local level so that people can access a range of local services and facilities, ideally within 20 minutes of home.*
>
> *….The 20-minute neighbourhood concept is supported by research that demonstrates neighbourhoods with a mix of services and facilities, and which are well-connected by walking and cycle paths and local public transport, tend to be safer and more inclusive communities and to have vibrant local economies.*
>
> *20-minute neighbourhoods help improve health and wellbeing, reduce travel costs and traffic congestion, and reduce vehicle emissions. They also create opportunities to provide a greater diversity of housing choices close to where goods and services are located."*[14]
>
> and
>
> *Creating a city of 20-minute neighbourhoods relies on creating the market size and concentration that can support a broad range of local services and facilities.*[15]

The Plan Melbourne Refresh Discussion Paper reinforced the concept of 20 minute neighbourhoods, albeit with some definitional refinement. It outlines the following key benefits:

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[13] *Plan Melbourne 2014, Direction 4.1*
[14] *Plan Melbourne 2014, page 114, A city of 20 minute neighbourhoods*
[15] *Plan Melbourne 2014, page 11, 20 minute neighbourhoods*

- Improved health (by encouraging physical activity like walking and cycling).
- Less need to travel long distances by car, which reduces household travel costs.
- Less greenhouse gas emissions (and pollution).
- Lower major infrastructure costs (by making best use of existing infrastructure).
- Better sense of place and the encouragement of vibrant, convenient and safe neighbourhoods.
- Population growth is accommodated with more housing choice in locations with better access to services.
- Enhanced community and social equity benefits such as better design for the elderly, the young and parents, and more interactions living and meeting locally.

It also states:

> *The 20-minute neighbourhood concept requires urban planning and design ideas that promote walkable neighbourhoods (and rollable ones for those unable to walk) and better access to local services for daily needs. As the MAC (2015) report notes, this requires moderately higher densities in neighbourhoods to support viable local services."*[16]
>
> and
>
> *"The 20-minute neighbourhood concept has important implications for urban planning and design that are not clearly articulated in Plan Melbourne 2014. These can be broadly outlined as:*
>
> - *Local-level walkability/rollability planning and better street level urban design*
> - *Supporting the provision and development of good quality local destinations. The concept strongly supports the polycentric model for Melbourne. This means that neighbourhood centres as well as major centres and the CBD will grow so people can live close to the local services they need.*
> - *Encouraging higher urban densities close to neighbourhood centres as contextually appropriate. Housing densities will increase as appropriate to reflect the range and scale of activity centres and their walkable/ rollable catchments throughout Melbourne."*

While there are a range of views and interpretations about what destinations and forms of transport should define a 20 minute neighbourhood, the Plan Melbourne Refresh Discussion Paper focuses on the ability to meet every day non-work needs primarily within a 20 minute walk.

Based on typical, able bodied adult walking speeds, a 20 minute walk equates to a distance of around 1.6km

This concept and definition closely matches the contemporary approach to planning in greenfield areas which is based on creating self-contained communities generally within the traditional Melbourne one-mile grid road network. The synergies between planning for 20 minute neighbourhoods and the contemporary approaches to greenfield planning are strong and will be further explored in the next section.

[16] *Plan Melbourne Refresh Discussion Paper, page 16*

## DELIVERING THE STRUCTURE FOR COMPACT AND LIVEABLE COMMUNITIES

***The setting for the integrated urban structures and infrastructure now being provided in contemporary greenfield planning should be capable of being leveraged and taken advantage of into the future (beyond the initial development phase).***

***Full achievement of the 20 minute city concept will rely on a whole range of interrelated factors and may not be achieved to its maximum effect in a single development phase.***

Since the introduction of the Precinct Structure Planning Guidelines in 2009, planning for new communities in greenfield areas has been providing increasingly strong foundations for delivering compact, vibrant and integrated communities – in essence 20-minute neighbourhoods. Some of the key approaches and deliverables in this planning are outlined below.

### Transport networks

A key goal of greenfield planning is to deliver connected, distributed and permeable transport networks based on the backbone of the typical 'mile grid' configuration.

Key PSP planning standards include:

- Arterial roads spaced at approximately 1.6 kilometre intervals that also facilitate the principal public transport network.
- Bus capable connector streets spaced at approximately 800 metre intervals that connect to the principal public transport network (both bus and rail), town centres and community facilities.
- Off road bicycle facilities on all connector streets and arterial roads creating an environment whereby most residents will be within 400-500m of an off-road bike path.[17]
- Permeable local streets with limited block lengths, footpaths on both sides of the reservation and crossing points at regular intervals and along key pedestrian desire lines.
- Provision of land for future rail reservations, stations, bus interchanges and park and ride facilities where these have been identified.
- Dedicated off-road shared pedestrian and cycle paths through open spaces and along waterways.

### Public Open Space

Other than the transport system, the open space network provides the second major public and physical structural feature across the metropolitan area. Open space includes all land set aside specifically for recreation purposes as well as waterways, conservation and habitat, cultural heritage and utilities easements.

In Greenfield areas, the PSP guidelines provide a strong foundation for consistent and high quality delivery of open space networks for new communities. This is resulting in, on average, around 20% of the total area of contemporary PSPs being provided as public open space of one form or another. This compares favourably with a Melbourne area average of around 10%.

This level of provision also provides a strong basis for delivering amenity to communities when the market is ready to deliver densities greater than might be supported today.

Key PSP open space planning principles include delivering a network that:

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[17] *Note: the PSP guidelines call for linear trails within 1km of 95% of all dwellings. Through a process of continuous improvement and liaison with Councils, this standard has been significantly improved upon.*

- Is equitably distributed, aiming for parks to be located within a safe 5 minute walk (approx. 400m) of 95% of residents.
- Has good access and connectivity via safe pedestrian and cycle links, public transport options and where practicable co-located with community infrastructure.
- Is of an appropriate quality that optimises capacity and resilience and community appreciation.
- Provides an appropriate quantity of open space to cater for a range of community uses.
- Provides a diversity of open space types that provide for a range of uses, functions and differing levels of amenity, depending on the anticipated or actual demand and use profile of the area
- Is sustainable in terms of supporting biodiversity and city amenity, being fit for purpose, fiscally responsible and resource efficient.

### Community Infrastructure

Community infrastructure most commonly relates to the provision of public and independent schools, local council community centres, kindergartens and maternal and child health facilities. These are the facilities most heavily influenced by structure planning. The term also covers a myriad of other essential infrastructure such as medical centres, emergency services and justice facilities as well as public and private child care. There are also strong synergies between some community infrastructure, town centres and parts of the open space network.

Structure plans either set land aside for these facilities where there is certainty of delivery (e.g. schools and integrated community centres) or facilitate their future location (e.g. associated with town centres) by ensuring appropriate planning guidance or controls are in place.

Typical PSP planning principles include:

- Community facilities (e.g. schools, community centres, sports reserves) generally being co-located in community hubs, and with good visual and physical links to a town centre.
- Land hungry community uses (e.g. sports reserves) generally being located further from the local town centres than land efficient community uses (e.g. childcare and community centres).
- Primary schools (both government and non-government) being located on connector streets and not on arterial roads.
- Secondary schools (both government and non-government) being located on bus capable connector streets with access to the PPTN (on arterial roads), where practicable.
- Community facilities, particularly schools, being linked to the cycling and walking network, and the local and regional public transport network.
- Planning any required health or justice facilities as part of either a community hub or town centre and with easy access to the principal public transport network.

### Town Centres

In Greenfield areas, PSPs determine the location of various types of town centres, from small convenience centres through to local town centres and major activity centres. PSPs also identify dedicated employment areas that provide for local jobs. Some of the key town centre and employment precinct planning principles applied by the MPA are:

- Ensuring local town centres include a supermarket and ancillary retail and commercial businesses and that 80-90% of households are within 1km of them.
- Locating uses with higher employment density or frequent visitation within local town centres and locating larger office, retail and community facilities in principal and major town centres.

- Prioritising pedestrian movement over vehicle movement and incorporating civic and meeting spaces.
- Providing opportunities for small business in and adjacent to town and activity centres, including in conjunction with a dwelling.
- Locating local town centres and employment precincts in areas of existing or future public transport.
- Ensuring employment areas provide opportunities for services that benefit workers, local residents and visitors.

More distributed and economically viable town and employment centres, linked to the public transport network and supported by medium and high density housing within walkable catchments, provides the opportunity to maximise the number of people that can carry out everyday shopping, work and other activities locally. This in-turn maximises use of the infrastructure provided and facilitates alternative transport choices that sets the scene for reducing the frequency and length of private vehicle trips.

Locating larger, major activity centres, at key public transport hubs also reduces the need for private vehicle trips, and the area of valuable land taken up by carparks.

### Future Leveraging of Greenfield Infrastructure

As a consequence of modern structure planning, town centres, schools, community facilities, sports-fields, public transport ready infrastructure and a diversity of other open spaces can all be within a 20 minute walk of most residents, with many of the elements being even closer than this.

Much of this infrastructure will also have the capacity, or could be readily adapted to service a population greater than originally envisaged by a PSP. While in some cases, further investment to increase carrying capacity of relevant infrastructure may be required overall, there would likely be substantial efficiency dividends. It could be expected that the private sector would also respond to additional demand in relevant areas, by providing additional community and other services.

The Plan Melbourne Refresh Discussion Paper has at least partly anticipated this as follows:

> *"It should also be recognised that urban areas evolve and grow their amenities over time. At different points of time, areas of Melbourne currently accepted as established were initially greenfield growth areas. For example, suburbs such as Chelsea and Pascoe Vale were greenfield growth areas in the 1950s and Boronia and Croydon in the 1960s and 70s. These areas have steadily developed a range of community infrastructure and services that provide a predictable level of amenity attractive to many households. It may be argued that Melbourne's current greenfield growth areas are likely to follow the same model."*[18]

For example, the open space systems in greenfield areas have significant capability to absorb greater use. Similarly, the co-located school and community centre hubs that are a key feature of modern greenfield planning have a great deal of potential for adaptation and increased capacity, with many already being designed and constructed to maximise future flexibility and effectiveness.

Even in terms of the capacity of greenfield school sites to accommodate future increased community use, there is much opportunity. With the school footprints provided in new suburbs being over 60%[19]

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[18] *Plan Melbourne Refresh Discussion Paper, page 36*

[19] *Note based on GIS analysis of average government school sizes in established (non-growth area) municipalities in metropolitan Melbourne (2.8ha avg.) V typical school provision for new communities of 3 x 3.5ha primary schools for every 8.4ha secondary school (4.7ha avg.). Analysis of relative student populations (e.g. students per m2) has not been undertaken to date.*

larger than in established suburbs, there could be opportunities to utilise school fields for community sport, and / or to accommodate new 2-3 storey buildings.

It is also possible that as more viable and effective public transport options become available (assisted by increased density), and as more local destinations encourage increased walking and cycling, that congestion impacts on the local road network could be significantly mitigated over time.

In terms of funding upgrades to established infrastructure, to accommodate the future growth that use of the RGZ could facilitate, the option would be open for Councils to develop and apply local DCPs / ICPs following completion of the relevant greenfield DCP / ICP. This could be undertaken in conjunction with future housing strategies that would assist in translating the UGZ to the standard zones.

### Summation

The urban structure framework and infrastructure capacity provided through contemporary greenfield planning, provides the setting for distributed destinations and amenity across the urban landscape. The application of the facilitative RGZ to deliver a range of housing and land-use outcomes within the walkable catchments of key destinations and facilities will support new suburbs in reaching their potential and will enable the concept of 20 minute neighbourhoods to be fully realised. This remains so even if a particular PSP outlines specific dwelling / density targets within the walkable catchments, as the urban structure will provide ample capacity for further increases to housing diversity and density over time and when the market is ready.

***Figure 2. – Key Urban Structure Components Example***

Graphic depicting the layering of key precinct and infrastructure features leading to an integrated structure (Truganina PSP approved 2014)

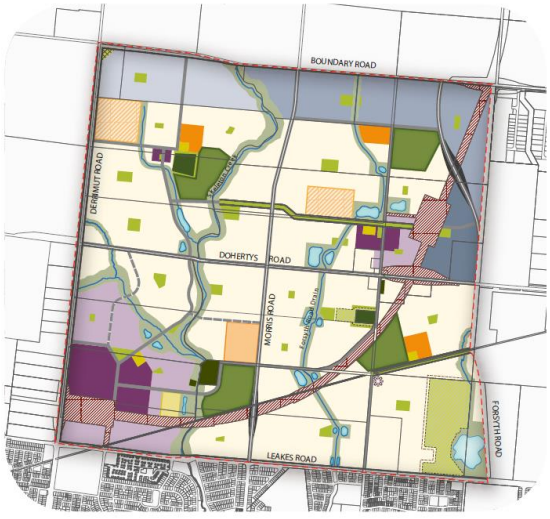
Rail, station and town centres

Plus schools and community facilities

Plus permeable road network

Plus open space system

Plus off-road trail network




The PSP = an integrated plan

## INFORMING THE COMMUNITY AND ASSISTING COUNCIL TO MANAGE LOCAL LEVEL POLICY

***The right planning settings should preferably be in place from the outset to signal to communities that urban environments are dynamic and evolving and to provide Councils with the scope to translate and manage zones in the future.***

Managing change in established areas will likely always be contentious in one way or another. However, much of the difficulty surrounding the creation of a more compact urban form in established areas is related to the expectations and settings that were in place at the time residents arrived. In essence, transitioning from a more restrictive land use zone to a more facilitative land use zone is often objected to by local residents, creating difficult and potentially divisive circumstances for local communities and councils.

Alternatively, if as is proposed within greenfield areas, a more facilitative zone such as the applied RGZ is strategically applied within the walkable catchment of key amenity, activity and public transport features from the outset of development, then there is likely to be an understanding that the change that the zone allows for, may occur at some time in the future. This is an important point, due to the fact that in areas where GRZ is the applied zone (and once a greenfield area has become established) development would need to respond to the existing neighbourhood character (much of which would be detached housing), thus limiting the potential for change. (See also discussion on pages 4-6)

Importantly, there will still be room for discretion and flexibility for local councils to translate the applied zone to another suitable zone following completion of development outlined in the PSP. This could be further informed by any strategic work that they may undertake at the time (e.g. Housing Strategy). Having the RGZ as a starting point will provide a stronger basis at the time of translation for its retention within the walkable catchments defined through the PSP.

Indeed this change is anticipated in the Plan Melbourne Refresh Discussion Paper as follows:

> *Efforts to encourage greater housing diversity also need to account for issues of density and urban change which are deeply intertwined. The development of local housing strategies provide a forum for planning for future housing needs in the context of other urban priorities, such as the preservation of character. This is often challenging as the benefits of greater housing choice need to be balanced with concerns about change and character, which for local communities can sometimes appear more pressing and tangible. The MAC (2015) report advocates for government "to embark upon informing the Melbourne community of the benefits of more diversity and choice in the housing sector"[20].*

In essence the applied RGZ provides a basis for this 'informing' of local communities and will give local government the flexibility they need to shape the finer policy on the ground in the long term.

[20] *Plan Melbourne refresh Discussion paper, page 42*

# 4 PURPOSE AND OPERATION OF ZONES AND PRACTICE NOTE GUIDANCE

## DISCUSSION

While the revised and more strategic VPA position with regard to applying the RGZ is considered to address the key issues raised at recent panels, there is still potential for confusion regarding interpretation and use of Planning Practice Notes 47 'Urban Growth Zone' and 78 'Applying the Residential Zones' for growth areas.

In short:

- The VPA refers to Practice Note 47 for use of the UGZ and contends that practice notes relating to the use of other zones are secondary to PPN47.
- The panels made references to PPN78, emphasising the need for VPA to use the approach and criteria outlined for application of residential zones in the UGZ.

It is the VPA's strongly held view that PN47 explains the role of the Urban Growth Zone (UGZ) with regard to PSPs, which is used to manage the transition of non-urban land into urban areas. In terms of land use provisions, the practice note provides an option to use applied zones to ensure simplicity and consistency during the life of the PSP. Once development has completed, the applied zones in the UGZ will be translated into an appropriate standard zone by the relevant council.

PN78 essentially provides direction for the strategic application of the residential zones, largely prepared to guide councils during the introduction of these new provisions for municipality-wide zone translations in established areas

While both practice notes have merit for consideration in growth area planning, arguably PN47 should hold more relevance to greenfield planning because it directly addresses the use of the Urban Growth Zone, which is the overarching provision for implementation of PSPs.

The MPA maintains that one of the key purposes of the UGZ is to manage the transition of non-urban land to urban land once a PSP is approved and all development proposed under the UGZ must be generally in accordance with the PSP.

It is also clear that in greenfield areas that it is the UGZ and the PSP that are the primary vehicles for guiding the development of the land, including the desired housing outcomes. Consequently, the purpose of the UGZ should be prioritised over the applied zones in guiding discretion for the growth areas.

# 5 APPENDICES

## A - DETAILED GUIDANCE FOR APPLICATION OF THE RGZ IN GREENFIELD PSPS

| Walkable Catchment | From Feature | How | Policy References / Justification |
|---|---|---|---|
| 800m | PPTN - Railway stations | From centroid or perimeter of station platform footprint if known | **Policy References**<br>- Cl18.01-2 – *"Encourage higher land use densities and mixed use developments near railway stations, major bus terminals, transport interchanges, tramways and principal bus routes."*<br>- Cl18.02-3 – *"Achieve greater use of public transport by increasing densities, maximising the use of existing infrastructure and improving the viability of the public transport operation."*<br>- Cl56.04-1– *"provide for 95% of dwellings to be located no more than…. 800m street walking distance from the nearest existing or proposed railway station*."<br>**Comment**<br>- Stations provide access to high capacity and high frequency transport services, are generally collocated with town centres and form destinations that people are more likely to walk longer distances to access. Therefore a 10 minute walking distances considered reasonable. |
| 800m | Major Town Centres (MTCs) | From the perimeter of the retail / commercial core | **Policy References**<br>- Cl16.01-2 – *"Encourage higher density housing development on sites that are well located in relation to activity centres, employment corridors and public transport."*<br>- Cl16.01-4 – *"Ensure planning for growth areas provides for a mix of housing types and higher housing densities in and around activity centres."*<br>- Cl 56.04-1 – *"To achieve higher housing densities within walking distance of activity centres"*<br>- Growth Corridor Plans (GCPs) 3.1.2 *"Major Town Centres…will contain a diverse range of housing options, including medium to higher density housing in and around the centre location and a diverse range of businesses and jobs."*<br>**Comment**<br>- Generally located on the PPTN major activity and employment generators containing a large number of activities and destinations that people are more likely to walk longer distances to access. Therefore a 10 minute walking distance is considered reasonable. |
| 600m | Specialised Town Centres (STC) | From the perimeter of the retail / commercial core | **Policy References**<br>- Cl16.01-2 – *"Encourage higher density housing development on sites that are well located in relation to activity centres, employment corridors and public transport."*<br>- Cl16.01-4 – *"Ensure planning for growth areas provides for a mix of housing types and higher housing densities in and around activity centres."*<br>- Cl 56.04-1 – *"To achieve higher housing densities within walking distance of activity centres"*<br>- Growth Corridor Plans (GCPs) 3.1.2 *"Specialised Town Centres… should be highly accessible by public transport."* |

| | | | |
|---|---|---|---|
| | | | **Comment**<br>- Generally located on the PPTN, specialised town centres are larger than local town centres and have some characteristics of major town centres and containing a range of activities and destinations that people are more likely to walk longer distances to access. Therefore a 7.5 minute walking distance is considered reasonable. |
| 600m | PPTN - Bus Routes | From road reserve centreline | **Policy References**<br>- Cl16.01-2 – *"Encourage higher density housing development on sites that are well located in relation to activity centres, employment corridors and public transport."*<br>- Cl18.01-2 – "*Encourage higher land use densities and mixed use developments near railway stations, major bus terminals, transport interchanges, tramways and principal bus routes."*<br>- Cl18.02-3 – "*Achieve greater use of public transport by increasing densities, maximising the use of existing infrastructure and improving the viability of the public transport operation."*<br>- Cl56.04-1 – *"To achieve housing densities that support compact and walkable neighbourhoods and the efficient provision of public transport services".*<br>- GCPs generally outline prioritising of activity and density around the PPTN, e.g., 3.2.1 states. *"Throughout the Growth Corridors, land uses along suitable parts of the PPTN will generally be managed to support development of higher density housing and other uses that are likely to benefit from public transport access"*<br>**Comment**<br>- While Cl 56.04 states that 95% of dwellings should be within "*400m street walking distance of a bus stop"*, the VPA contends that the future PPTN, being a high frequency and high capacity services, would have more in common with the tram network standard of 600m. This approach is supported by PTV and associated VISTA data.<br>- Given the above, and the need for zoning to signal and support future investment in high quality public transport, a 600m (7.5 minute walk) distance is considered appropriate, with room for some discretion for above or below this distance to address local conditions. |
| 400m | Local Town (Activity) Centres (LTCS) | From boundary of LTC as defined by the PSP | **Policy References**<br>- Cl16.01-4 – *"Ensure planning for growth areas provides for a mix of housing types and higher housing densities in and around activity centres."*<br>- Cl 56.03 – "*To create compact neighbourhoods that are oriented around easy walking distances to activity centres, schools and community facilities, public open space and public transport".*<br>- Cl 56.04-1 – *"To achieve higher housing densities within walking distance of activity centres"*<br>- PSP Guidelines element 3 standard S1 – *"Activity centres and land within the walkable catchment of activity centres incorporate mixed use development".*<br>- Safer Design Guidelines for Victoria 1.2.1 – *"Ensure all parts of a neighbourhood are within a five minute walk (400 metres) of the neighbourhood centre."* |

| | | | |
|---|---|---|---|
| | | | - Safer Design Guidelines for Victoria 1.4.1 – *"Increase residential density and mix near activity centres and parks to increase the presence of people on the street"*<br><br>**Comment**<br><br>- Local town centres are planned to service local neighbourhoods for most everyday needs and typically deliver around 8,000-10,000m2 of retail floor-space inclusive of a full line supermarket and supporting shops. They are generally of a higher order nature compared to established area LTCs due to a minimum provision of full-line shopping for food, liquor and grocery. They also provide for other uses such as gyms, health, small office and other service businesses.<br>- Given the above, prioritising the applied RGZ within 400m or a 5 minute walk is considered a reasonable response. |
| 100m-200m | From community hubs and Neighbourhood Convenience Centres (NCCs) | From boundary of community hub inclusive of schools, community facilities and sports-fields | ***Policy References***<br><br>- Cl 56.03 – *"Locate community facilities on sites that are in or near activity centres and public transport."*<br><br>*and;*<br><br>- "School sites should…..be located on walking and cycling networks, have a bus stop located along the school site boundary…..be accessible by the PPTN…"<br>- Cl 56.04-1 *"To achieve housing densities that support compact and walkable neighbourhoods and the efficient provision of public transport services"*.<br>- Safer Design Guidelines for Victoria 1.2.1 – *"Ensure all parts of a neighbourhood are within a five minute walk (400 metres) of the neighbourhood centre."*<br>- Safer Design Guidelines for Victoria 1.4.1 – *"Increase residential density and mix near activity centres and parks to increase the presence of people on the street"*<br><br>**Comment**<br><br>- Community hubs in newly planned communities will generally contain multiple collocated facilities for use by local communities.<br>- They are generally located on connector roads that provide for local bus services, high standard pedestrian paths and dedicated off road cycle paths that link to nearby town centres and future higher frequency bus routes.<br>- Larger community hubs may also include indoor sports and cultural elements, attracting greater use and visitation. Sometimes this may also include indoor recreational facilities and libraries.<br>- Given the above and the lower key nature of activities within and servicing to such hubs (compared to other planned features) a smaller 100-200m (around 2.5 minute walk) RGZ buffering is considered reasonable. While 200m is considered a reasonable starting point, discretion can be applied on a case by case basis depending on the scale and mix of community facilities.<br>- Discretion should particularly apply to buffer distances from NCCs as they may vary significantly in size and function and, so there value as a destination will also vary. |

**Appendix 3:** Letter from PTV regarding application of Residential Growth Zone in Mt Atkinson and Tarneit Plains

PUBLIC TRANSPORT VICTORIA

PO Box 4724
Melbourne Victoria 3001
Australia

Telephone 1800 800 007
ptv.vic.gov.au

TRIM Ref: FOL/14/10848-2

Ben Hawkins
Senior Structure Planner
Victorian Planning Authority
Level 25, 35 Collins Street
**MELBOURNE VICTORIA 3000**

Dear Ben

**MELTON PLANNING SCHEME AMENDMENT C162 – MT ATKINSON & TARNEIT PLAINS PRECINCT STRUCTURE PLAN**

Public Transport Victoria (PTV) is aware that the Victorian Planning Authority is being challenged on the blanket application of the Residential Growth Zone (RGZ) in greenfield Precinct Structure Plans (PSPs).

PTV considers there is strategic merit in applying the RGZ to land that is proximate to the Principal Public Transport Network (PPTN). The PPTN is a land use tool that depicts a long term vision for a network of public transport corridors expected to provide high-quality public transport services across the metropolitan area. These typically connect activity centres which may be able to support more intensive land development.

The role of the PPTN is to indicate to planners where greater activity could be accommodated on the public transport network. The PPTN includes tram, rail and high-frequency bus routes, including SmartBus routes and key transport interchanges.

Another advantage of the PPTN is the clarity it provides for local governments and communities about key public transport routes to guide local development decisions. It encourages development along and near public transport routes and nodes, and demonstrates how the network can underpin future growth.

Analysis of travel behaviour in Melbourne indicates that currently passengers are prepared to walk up to 800 metres and beyond to access a rail station and 600 metres for a tram or high frequency bus. This could increase in future with introduction of more frequent services.

Therefore PTV considers it reasonable that the RGZ be applied to land within 600 metres of the road based PPTN as shown in the West Growth Corridor Plan and 800 metres of the potential future rail station at Mount Atkinson.

I trust that this will assist with your forthcoming Panel.

Yours sincerely

MARK BURTON
Manager, Place Planning
6/09/2016

**Appendix 4:** Revised Schedule 9 to the DCPO

## Schedule 9 to the DCPO – proposed drafting changes to clause 4.0

A permit may be granted to subdivide land, construct a building or construct or carry out works before a precinct wide contributions plan has been prepared to the satisfaction of the responsible authority if any of the following apply:

- An agreement under section 173 of the *Planning and Environment Act 1987* has been entered into with the responsible authority that makes provision for the delivery or items listed in the Precinct Infrastructure Plan within the *Mt Atkinson & Tarneit Plains Precinct Structure Plan*, incorporated document.

- The permit contains a condition requiring an agreement under section 173 of the *Planning and Environment Act 1987* that makes provision for contributions to items listed in the Precinct Infrastructure Plan within the *Mt Atkinson & Tarneit Plains Precinct Structure Plan*, incorporated document with the agreement being required to be entered into before the issue of any Statement of Compliance. At the discretion of the responsible authority, the agreement may make provision for works in kind to be carried out having regard to the infrastructure projects set out in the Precinct Infrastructure Plan contained in the *Mt Atkinson & Tarneit Plains Precinct Structure Plan.*

- The responsible authority considers that the permit does not compromise the orderly planning of the precinct for the construction of a building or construction or carrying out of works associated with:
  - Additions or alterations to a single dwelling or development ancillary to the use of land for a single dwelling.
  - An existing use of land provided the gross floor area of the existing use is not increased by more than 1000 square metres.
  - A sign.
  - A permit that only allows the consolidation of land or a boundary realignment.

**Appendix 5:** Letter from APA regarding application of Mixed Use in the Pipeline Measurement Length

APA VTS Australia (Operations) Pty Limited ACN 083 009 278
180 Greens Road Dandenong VIC 2175
PO Box 4204, Dandenong South VIC 3164
P: +61 3 9797 5222 | F: +61 3 9797 5295
APA Group | apa.com.au

29 August 2016

Ms Martina Johnson
Director- Greenfields
Victorian Planning Authority
Level 25, 35 Collins Street
**MELBOURNE VIC 3000**

Mail to: Martina Johnson Martina.Johnson@vpa.vic.gov.au **EMAIL OUT**

**RE: AMENDMENT C162 TO THE MELTON PLANNING SCHEME – MIXED USE ZONE WITHIN THE MT ATKINSON (PSP1082).**

Dear Martina

Thank you for your email 26 August 2016 in relation to the mixed use zone within the Mt Atkinson Precinct Structure Plan. This communication is in response to Melton City Councils request for information in relation to the proposed use in relation to APA VTS Australia's [(Operations)(*herein APA*)] pipeline assets.

APA can confirm that they are comfortable with the location of the small strip of mixed use zone within the APA Truganina to Plumpton (PL122/T118) 500mm high pressure gas transmission pipeline which has a measurement length of 495 metres.

APA understands that the proposed Mixed Use Zone is outside of the measurement length of the Derrimut to Sunbury (PL122/T62) 150mm high pressure gas transmission pipeline and that safety concerns have been adequately assessed.

For any further enquiries relating to this letter please feel free to contact the Infrastructure, Planning & Protection Team on (03) 9797 5118 or by email apaprotection@apa.com.au.

Yours faithfully,

**LACHLAN MARSHALL**
**LAND AGENT- VICTORIA**

**Appendix 6:** Meeting File Note: Mt Atkinson and Tarneit Plains PSP- Traffic issues relating to the land north or the rail corridor in the Mt Atkinson and Tarneit Plains PSP

# Meeting File Note- Mt Atkinson and Tarneit Plains PSP- Traffic issues relating to the land north of the rail corridor in the Mt Atkinson and Tarneit Plains PSP

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| Container | CF/16/110 |
| Record Number | D/16/6058 |

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| **Date:** | 21.09.16 | **Time:** | 12:00 |
| **Meeting Location:** | VPA Offices | | |
| **Attendees:** | John Cicero (Best Hooper Lawyers, representing MSA Properties)<br>Don Robertson (Traffix Group, representing MSA Properties)<br>Kelly Archibald (Melton City Council)<br>Charles Cornish (Melton City Council)<br>Greg Tobin (Harwood Andrews, representing Melton City Council)<br>Anthony Caligiuri (Mount Atkinson Holdings)<br>Nicola Collingwood (Owen Dixon Chambers representing Mount Atkinson Holdings)<br>Frank Deserio (VicRoads)<br>Chris Butler (Cardno, representing VPA)<br>Adele Patterson (Isaacs Chambers, representing VPA) | | |
| **VPA Attendees:** | Mark Knudsen (VPA)<br>Michal Pywell (VPA)<br>Nick Power (VPA)<br>Ben Hawkins (VPA) | | |
| **Key Aspects Discussed:** | The suitability of the Traffix Group's functional layout plan (FLP) for intersections IT-01 and IT-02 of the PSP:<br>• When complete, the development of the land north of the rail corridor, combined with the future development in Warrawee and the existing freeway interchange require two intersections with Hopkins Road (IT01 and IT02).<br>• Given the multiple land owners that will benefit from this infrastructure, it is appropriate for the interim intersection construction to be funded from the Mt Atkinson & Tarneit Plains ICP, and potentially from the adjoining Warrawee ICP in the case of IT-02, in accordance with the yet to be publicised guidance and direction relating to Infrastructure Contribution Plans<br>• While the 2026 forecasts prepared by Traffix Group for the subject land are higher than the VPA forecasts, ANY significant development (even the VPA assumed level) will trigger the need for a new/ upgraded intersection involving signalisation.<br>• A typical intersection arrangement will involve an additional through lane and at least a separate turn lane at the intersections for each movement on Hopkins Road.<br>• Furthermore, to manage queuing and ensure signal progression, the proximity of intersections IT-01 and IT-02 (when both are constructed) justifies any additional Hopkins Road through lanes to | | |

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| | be continued between the intersections, resulting in three lanes in each direction (irrespective of the actual level of development)<br>• The draft FLP prepared by Traffix (Appendix C), subject to refinement provides a sound conceptual basis for the future interim treatment of intersections IT-01 and IT-02 and Hopkins Road in their vicinity.<br>• It was generally agreed that the northern intersection (IT-01) should be developed first (construction of IT-02 will require the signalisation of IT-01 in any event)<br>• The treatment will probably (subject to agreement with VicRoads) need to make provision for future arterial road upgrades through providing a wide median to accommodate additional through or turning lanes.<br>• The precise treatments of proposed linkages between the on- and off-ramps and development (including the Service Centre and Part A Land) requires further development and is subject to agreement form VicRoads (noting that in both cases these are temporary connections pending construction of the future Outer Metropolitan Ring Road). An ultimate intersection treatment will be determined in consultation with VicRoads.<br>• The treatment adopted for IT-01 should (if feasible) also have regard to the eventual modifications proposed to reconfigure the interchange to provide for the Outer Metropolitan Ring Road<br>• The need to construct the intersections will only arise once the land north of the rail and west of Hopkins Road commences development- development south of the rail line will not be a trigger for the need to construct the interim proposal for the intersections.<br>• Melton City Council reserve the right to seek supplementary ICP funding following the release of ICP guidance and direction. |
| | Modelling Assessment:<br>• The Jacobs modelling undertaken for 2026 is broadly acceptable, in terms of transport network assumptions and model structure. These traffic forecasts are based on 2026 build-out assumptions designed to reflect a reasonable life for any development–related road network investment.<br>• Modelled 2026 traffic volumes would require Hopkins Road to be constructed (without intersections) as a four-lane arterial. |
| | Other works:<br>• The PSP documentation (the Precinct Infrastructure Plan) should also acknowledge the future need for the following State-funded projects:<br>o duplication of the current two-lane Hopkins Road bridge over the Western Freeway; and<br>o The grade separation at the Hopkins Road / railway line interface.<br>• The timing of these works will be determined through the State Budget process taking into account need, available funding and State-wide investment priorities. |

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| | • In Council's submission to the exhibited documents, the potential for a road bridge over rail was discussed. Subject to final agreement regarding the function layout plans, this is no longer required. |
| **Outcomes:** | Mount Atkinson Holdings to confirm position on this issue |
| | Circulate minutes to Panel to confirm that all parties are generally in agreement subject refinement of the FLPs |
| | VPA to undertake FLPs for the interim and ultimate arrangements for use in the Land Use Budget and ICP. |
| | Melton City Council reserve the right to review their position following release of ICP guidance and direction regarding allowable supplementary items. |

**Prepared by:**

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| **Name:** | Ben Hawkins | **Date:** | 21.09.16 |

**Appendix 7:** Response from DELWP to Submission 13

**From:** michael.ward@delwp.vic.gov.au
**To:** Ben Hawkins
**Subject:** Re: FW: Melton Planning Scheme Amendment C162: Mt Atkinson and Tarneit Plains Precinct Structure Plan
**Date:** Friday, 23 September 2016 12:35:07 PM
**Attachments:** ATT00001.gif
ATT00002.gif
ATT00003.gif
ATT00004.gif
ATT00005.gif
ATT00006.png
ATT00007.jpg
ATT00008.jpg
ATT00009.jpg
ATT00010.jpg
ATT00011.png

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Hi Ben,

Thanks for referring this for DELWP input.

The identification of Conservation Area 7 in the Biodiversity Conservation Strategy (BCS) is based on estimated data as DELWP was not able to obtain access to undertake relevant threatened species and vegetation surveys. The BCS identifies that flora and fauna surveys are to be undertaken within Conservation Area 7 to allow for determination of its management category. DELWP has not yet been able to obtain consent from the land owner to undertake surveys.

The Biodiversity Area Assessment Report undertaken for the GAA in 2009 by BIOSIS was not able to obtain access to the subject site however identified that based on reconnaissance surveys it is highly likely to comprise grassy native vegetation.

Based on current biodiversity information available (in the absence of field surveys) DELWP does not support the concept of locating a retarding basin within Conservation Area 7. This use and development is considered inconsistent with the objective of the conservation area as outlined in the Biodiversity Conservation Strategy (BCS)) which is which is the '*protection of high quality native grassland that contains high persistence habitat for Golden Sun Moth and Spiny Rice-flower within a practically manageable area*'.

It is noted that the consultant providing advice in regard to the retarding basin concept has also not been able to access Conservation Area 7.

DELWP's planning regarding future management of the conservation area and determination of suitable land uses will be based on on-ground vegetation and species surveys conducted in accordance with DELWP's Timestamping standards.

Please let me know if you need further background.

Cheers,
Michael

**Michael Ward | Senior Biodiversity Officer**
**Energy, Environment and Climate Change Group** | Department of Environment, Land, Water & Planning
Level 2, 8 Nicholson Street, East Melbourne, Victoria, 3002, DX210098
**T**: 03 9637 8125 | **M**: 0418 667 579 | **E**: michael.ward@delwp.vic.gov.au
www.delwp.vic.gov.au

From: Ben Hawkins <Ben.Hawkins@vpa.vic.gov.au>
To: "michael.ward@delwp.vic.gov.au" <michael.ward@delwp.vic.gov.au>,

Date: 21/09/2016 04:49 PM
Subject: FW: Melton Planning Scheme Amendment C162: Mt Atkinson and Tarneit Plains Precinct Structure Plan

Hi Michael,

Apologies for not circulating the attached earlier. It is a submission from a landholder in the Mt Atkinson PSP (PSP property 38). Their submission proposes an alternative development services scheme which would see the drainage infrastructure on their land (WI-09 on Plan 11 of the PSP) to Conservation Area 7.

They have provided an expert witness statement from an ecologist looking at the impact. Are you able to provide comment on DELWP's view of this option and what the process for gaining approval would be if it was to go ahead?

The landholder is submitting to the panel on Monday, so it would be useful for you to provide a brief comment on Friday?

Thanks

Ben

**Ben Hawkins // Senior Strategic Planner**
Victorian Planning Authority
Level 25, 35 Collins Street, Melbourne VIC 3000
T: 03 9651 9694 // E: ben.hawkins@vpa.vic.gov.au

*Partners in planning and infrastructure coordination*

**From:** Jennie Jones [mailto:jennie@beacontp.com.au]
**Sent:** Friday, 9 September 2016 5:23 PM
**To:** Campbell, Kirsty <Kirsty.Campbell@hsf.com>; 'planning.panels@delwp.vic.gov.au' <planning.panels@delwp.vic.gov.au>; 'harvard1@iinet.net.au' <harvard1@iinet.net.au>; Ben Hawkins <Ben.Hawkins@vpa.vic.gov.au>; Nicholas Power <Nicholas.Power@vpa.vic.gov.au>; 'gtobin@harwoodandrews.com.au' <gtobin@harwoodandrews.com.au>; 'tdabbs@harwoodandrews.com.au' <tdabbs@harwoodandrews.com.au>; 'randerson@rigbycoooke.com.au' <randerson@rigbycoooke.com.au>; 'hannah.w.gould@nortonrosefulbright.com' <hannah.w.gould@nortonrosefulbright.com>; 'elisa.dewit@nortonrosefulbright.com' <elisa.dewit@nortonrosefulbright.com>; 'Penny.Creswell@cleanaway.com.au' <Penny.Creswell@cleanaway.com.au>; 'jcicero@besthooper.com.au' <jcicero@besthooper.com.au>; 'gwood@tract.net.au' <gwood@tract.net.au>; 'cherish@nicheplanningstudio.com.au' <cherish@nicheplanningstudio.com.au>; 'Ian.mcleod@ecodev.vic.gov.au' <Ian.mcleod@ecodev.vic.gov.au>; 'Irene.nesci@gmail.com' <Irene.nesci@gmail.com>; 'plove@cem.edu.au' <plove@cem.edu.au>; 'Samuel.trowse@epa.vic.gov.au' <Samuel.trowse@epa.vic.gov.au>; 'Alastair.smith@sustainability.vic.gov.au' <Alastair.smith@sustainability.vic.gov.au>; 'Michelle.lee@mwrrg.vic.gov.au' <Michelle.lee@mwrrg.vic.gov.au>; 'frank.deserio@roads.vic.gov.au' <frank.deserio@roads.vic.gov.au>; 'admin@scbfs.com.au'

<admin@scbfs.com.au>; 'atlatinos.latinos@gmail.com' <atlatinos.latinos@gmail.com>; 'John.chambers@citywestwater.com.au' <John.chambers@citywestwater.com.au>
**Cc:** David Hodge <dhodge@diverscity.com.au>; Andrew Prout <Andrew.Prout@engeny.com.au>; Glenn Ottrey <Glenn.Ottrey@engeny.com.au>; Brett Lane <BLane@ecologicalresearch.com.au>; Brett Macdonald <BMacdonald@ecologicalresearch.com.au>
**Subject:** Melton Planning Scheme Amendment C162: Mt Atkinson and Tarneit Plains Precinct Structure Plan

Dear Sir/Madam

We act on behalf of the land purchases of PSP Property 38 (being Lot 4 LP 138528) Troups Road South, Mount Cottrell

Please find attached pdf copies of the expert witness statement of:

- Andrew Prout - Engeny -Drainage
- Brett Lane - BLA - Ecology

Yours sincerely
Jennie Jones

Jennie Jones
Principal Planner - Director
Beacon Town Planning Pty Ltd
ABN 68168162178
Lvl 1, 61-63 Commercial Rd
SOUTH YARRA, Vic., 3141
E: jennie@beacontp.com.au
Mob: +61 409 412141


Victorian Planning Authority