

10 May 2019

Elizabeth McIntosh
Strategic Planning Manager
Victorian Planning Authority
Level 25, 35 Collins Street
Melbourne VIC 3000

Dear Elizabeth,

Satterley Property Group acts as an agent for the owners of [REDACTED].

We have recently been made aware of Amendment GC102 to the Whittlesea and Mitchell Planning Schemes which seeks to introduce a 'final' *Donnybrook / Woodstock Infrastructure Contributions Plan* which reflects changes brought by the *Planning & Environment Amendment (Public Land Contributions) Act 2018* and includes updated project costs based on benchmarking undertaken by the Victorian Planning Authority (VPA). This has resulted in the application of a supplementary levy of \$34,777 which is well above the previously exhibited levy of \$412.00.

At this point in time we wish to make the following submissions:

- The supplementary levy appears to have been determined on the basis of benchmark costings that have not yet been formally approved by the VPA Board or the Department of Environment, Land, Water and Planning. It is not appropriate for a 'final' ICP to be based on 'interim' benchmarks.
- Submissions made by others (Councils and landowners) to date show that there is concern over the accuracy of these benchmarks and how they can be applied in a greenfield context.
- We do not support any further increase in the supplementary levy as exhibited until the benchmarks are finalised and approved.

We do intend to explore the Amendment documentation in more detail and reserve the right to expand on this submission, in parallel with discussions with the VPA.

Yours sincerely,

[REDACTED]
[REDACTED]