

Our Ref: JL:AG:949312

9 June 2020

**By Email**

Victorian Planning Authority  
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Dear Sir / Madam

**Sunbury South and Lancefield Road Infrastructure Contributions Plan  
Amendment C243 to the Hume Planning Scheme**

We act on behalf of Sunbury Hills Pty Ltd (**Client**), the registered proprietor of the land at 725 Sunbury Road, Sunbury (**Land**).

Our Client requests the following changes to Amendment C243 to the Hume Planning Scheme:

1. The works component of Bridge Projects SS-BR-01 and LR-BR-01 (**Bridges**) should be excluded from the Infrastructure Contributions Plan (**ICP**), or alternatively should be funded substantially from other sources, on the basis that
  - (a) the Bridges serve a regional function that is beyond the scope of both the Sunbury South and Lancefield Road Precinct Structure Plans;
  - (b) the inclusion of the Bridges in the ICP exacerbates inequities as between the Sunbury South PSP area and the Lancefield Road PSP area;
  - (c) the respective apportionment of each of the Bridges to each of the PSP areas is not apparent in the ICP or associated documents;
  - (d) the Bridges are substantial pieces of infrastructure, and are unlikely to be delivered by any one landowner as part of a Works-in-Kind arrangement. Similarly, the scale of the Bridges is likely to be significantly larger than infrastructure typically being delivered by local government;
  - (e) the Bridges are identified as critical pieces of infrastructure in the PSP documents and ought to be delivered at any early stage, rather than waiting for sufficient funds to accrue in the ICP works account; and

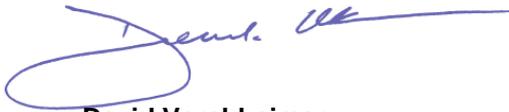
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- (f) the inclusion of the Bridges in the ICP results in a levy that is the most expensive in Victoria and which is significantly higher than comparable ICPs. For example, the supplementary levy is nearly 33% higher than the Minta Farm ICP and more than 80% higher than the Beveridge Central ICP.
2. The ICP ought to be separated into two discrete ICPs, relating to the Sunbury South PSP area and the Lancefield Road PSP area, as the currently proposed ICP effectively results in inequities and unreasonable cross subsidisation as between the two areas;
  3. Various infrastructure items (including but not limited to LR-RD-03, SS-IN-03, bridges and rail underpasses) have been apportioned less than 100% to the ICP area, although the underlying basis for the apportionment is not apparent in the ICP or associated documents. The rationale for the apportionment should be fully detailed in the ICP, together with any variations that might result; and
  4. The intersection of the Southern Bypass and Redstone Hill Road is located adjacent to a future school, community centre and a local convenience centre, and thus serves a regional function and should be funded by the ICP.

On behalf of our Client we welcome further discussions with the VPA in relation to the above. Should you have any queries please do not hesitate to contact us.

Yours faithfully



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