

Our Reference [REDACTED]

22 April 2022

Victorian Planning Authority
C/o Wonthaggi North East PSP
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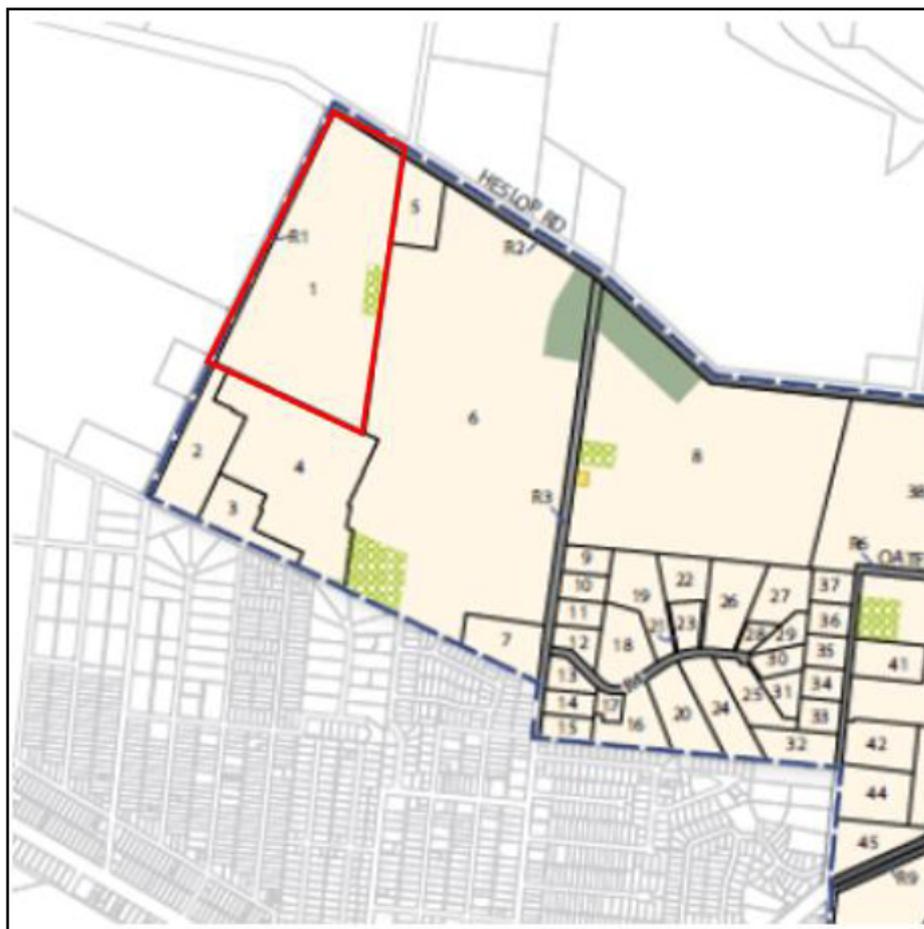
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Dear Sir / Madam,

**RE: ADDENDUM TO SUBMISSION TO THE WONTHAGGI NORTH-EAST PSP & DCP
PROPERTY ID #1 – FULLER ROAD NORTH WONTHAGGI**

Beveridge Williams acts on behalf of Summerfields Wonthaggi Pty Ltd in relation to the above matter. We refer to our previous submissions to this process.

The site to which this submission applies is formally known as Lot 1 TP232027. This property is identified as parcel identification number 1 in the Precinct Structure Plan (PSP) and Development Contributions Plan (DCP).



Information provided is incomplete

This submission is required to respond to the changes that have been made to the material previously exhibited by the VPA in December 2021. It was anticipated that a complete package of revised material would be provided and form the basis for consideration by submitters and the Advisory Committee. However, the material provided remains incomplete or has been provided in draft form and, in some cases, has not been provided at all.

It is noted that the material which has been provided was released 6 business days prior to deadline for submissions.

This has made the process extremely difficult for us as consultants to provide full and proper advice to our clients. It has also not afforded our clients sufficient time to fully understand the effects of these potentially significant changes to their land. We have yet to receive the promised changes report which would have assisted us to do this.

The piecemeal approach to the preparation and release of important information has led to unacceptable delays throughout this process. In addition to significant holding costs, those delays have caused unreasonable costs to submitters through the need to iteratively respond to information. Our client notes its serious concerns with the manner in which information has been provided to date and reiterates the need for procedural fairness to be afforded to submitters to allow them reasonable time to respond to information. For this reason, this submission is made without prejudice to our right to provide further responses if and when the VPA provides further material.

Despite the ongoing information and timing issues of this process we have conducted a review of the *Preliminary Drainage Review* prepared by Neil Craigie and Graham Daff and the revised *Functional Design Report* prepared by Alluvium and note the following on behalf of our client.

Open Space

In our previous submissions we noted that there is a discrepancy in the Public Open Space percentage included in R65 of the PSP and the Schedule to Clause 53.01 for residential land. We understand the POS calculation of 3.82% outlined in R65 has been calculated incorrectly as it includes local reserves provided for under the DCP. We understand the correct percentage should be 2.47% of NDHa.

We note that the VPAs response is that they agree to update R65 to 2.47% but that final confirmation is outstanding whilst further investigation work occurs. We reserve our right to address this matter through the ongoing process should the change not be reflected in the updated PSP and DCP documentation.

Community Infrastructure Levy (CIL)

In our previous submissions we noted that there is inconsistency within the CIL which is payable per dwelling. Page 8 of the Development Contributions Plan (DCP) states the CIL is capped at \$1,225 per dwelling, whilst Table 9 on page 35 shows that based on the DCP costings for the CIL per Dwelling computes to be \$1,178.97. We seek clarification on why the VPA & Council are seeking to collect a CIL that is above what is required to deliver the nominated projects.

We note that the VPAs response is outstanding whilst further investigation work occurs. We reserve our right to address this matter through the ongoing process should the change not be reflected in the updated PSP and DCP documentation.

Drainage – External Catchments

In our previous submissions we noted that the Alluvium Functional Design Report has included external catchments when sizing the sedimentation basin (SB-05) on-site. This results in the basin being considerably larger than necessary and will entail additional construction and land acquisition costs for the DCP.

We note that the VPA are currently investigating the apportionment of drainage items. We reserve our right to address this matter through the ongoing process.

We wish to highlight that the external catchments have been modelled in the calculations as though they are fully developed land parcels. This is highly unlikely to occur given the potential future township boundary to be applied to Wonthaggi as part of the ongoing Distinctive Areas and Landscapes process. We submit that these parcels be modelled as rural properties.

Modelling these parcels as rural properties would significantly reduce the annual volume of pollutant loads that are estimated to pass through the treatment asset and would reduce the area needed for the treatment asset. If the VPA wishes to pursue modelling the external areas as urban properties, then any increase in treatment asset size should be provided by contributions from the external properties as recommended in the review by Neil Craigie.

Drainage – BPEMG Targets

In our previous submissions we noted that the BPEMG targets proposed by Alluvium are higher than those outlined in the Drainage Report prepared by Engeny and will likely result in larger assets which are more expensive to deliver and maintain.

The VPAs response was that the targets for both reports were inline and that we should clarify the disparity.

The query regarding the higher targets was due to the increased treatment results that Alluvium had presented in the model. It was an assumption that the higher targets were used, as they seemed to match those requirements. As per the above comment regarding the inclusion of the external catchments, it is having the effect of oversizing the treatment assets.

We submit that the design be investigated further to reduce the sizing and costing so that the overall treatment targets align with the BPEMG rather than higher results as currently shown in Alluvium's Report.

Drainage – DCP Rate

In our previous submissions we noted that it appears that the DCP rate for drainage has increased substantially.

The VPA note that this is currently under investigation and that there may be cost savings resulting from the recent work. We reserve our right to address this matter through the ongoing process.

Land Valuation Methodology

In our previous submissions we noted that the methodology used to value the land which is required to be provided in the DCP is unclear.

The VPA has highlighted the relevant sections where the methodology is detailed and that a valuation report will be provided.

We note that these sections of the report discuss how land values were estimated for the purpose of preparing the DCP. There is no discussion on whether the land will ultimately be

