

15 July 2024

Strategic Planning Team
Melton City Council
232 High Street
Melton VIC 3337

RE: Amendment C232melt – Toolern PSP and DCP Review, Supplementary Submission

Insight Planning Consultants, on behalf of Australian Unity (**client**), wish to provide the following supplementary submission in relation to Amendment C232melt (the **Amendment**) to the Melton Planning Scheme, and specifically the proposed changes to the Toolern Precinct Structure Plan (**PSP**) and Development Contributions Plan (**DCP**) and accompanying planning scheme provisions.

Our original submission dated 16 May 2024 was submitted to Council in response to the exhibited Amendment and requested a number of clarifications and changes to the Toolern DCP and PSP, including:

- An exemption for development contributions payable under the DCPO3 apply to non-government hospitals.
- Levy rates in the DCP and DCPO3 to be amended to reflect the indexed rate at the time of approval (ie 2024/2025).
- Deletion of BD16 from the PSP and DCP. If this is not achieved, then the inclusion of the land required to accommodate BD16 should also be included in the DCP.
- Inclusion of the land project cost for Interchange Way (Urban Core Street C) in the DCP.
- Apportionment of costs associated with Urban Core Street A to the land parcels that directly benefit or facilitation of an Agreement to equitably distribute the costs.
- Correction of bridge design labels for BD15 and BD16 in Appendix 2 of the DCP.

Council responded to our submission on 31 May 2024, and advised that their stance in relation to the above matters, in particular the increased DCP rate, private hospital exemption and the additional infrastructure projects (BD16 – East Road Rail Overpass), remains unchanged. This response was formalised in the Submission Table that was presented to Council for consideration at the Council Meeting on the 24 June 2024. As such, we wish to provide this supplementary submission.

Our primary submission that the increased DCP levy rate is too high remains unchanged. However, if the rate is to be increased as exhibited, we submit that the residential densities in the PSP should be increased to help offset this.

Currently, the PSP, at Section 4.2.3, provides for an average density of no less than 15 dwellings per net developable hectare (**NDHa**) across the Precinct, and to locate high density within and proximate to activity centres, and high, medium and conventional density housing as defined in the glossary to generally conform with the areas shown on Plan 8 - Housing.

The glossary at Section 6.2 of the PSP outlines the following densities:

- Conventional Density Housing – Housing with a density range of 10 to 15 dwellings per NDHa;
- Medium Density Housing – Housing with a density range of 15 to 30 dwellings per NDHa;
- High Density Housing – Housing with a density of more than 30 dwellings per NDHa.

We believe that these densities should be increased in accordance with the VPA's recent PSP Guidelines (Oct 2021), which targets standard densities of 20+ dwellings per NDHa and medium densities of 30+ dwellings per NDHa. While the PSP does not set specific density targets within the Cobblebank Metropolitan Activity Centre (CMAC), in which our client's site is located, the CMAC Urban Design Framework (UDF) suggests a gross residential density within the South East Precinct (south of the railway line and east of Ferris Road) of more than 40 dwellings per NDHa.

Request

We request that as part of the Amendment, the residential densities within the Toolern PSP be increased to provide for an average density of no less than 20 dwellings per NDHa across the Precinct, and in accordance with the following:

- Conventional Density Housing – Housing with a density of at least 20 dwellings per NDHa;
- Medium Density Housing – Housing with a density of at least 30 dwellings per NDHa;
- High Density Housing – Housing with a density of more than 40 dwellings per NDHa.

Please do not hesitate to contact me on 0477 221 215 or monica@insightplanning.com.au if you have any queries.

Yours sincerely

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