

# Croskell (Employment) PSP & Amendment C296case

**Issued**  
09 October 2024

The logo for Beveridge Williams, featuring a large, stylized 'BW' in red and black, with the full name 'Beveridge Williams' in black text below it.

Executive Summary

The landowners of 35 Bocker Street, AVA Faltaous-Kyrellos Pty Ltd, are generally supportive of the exhibited Precinct Structure Plan (PSP) and its facilitation of the development of the precinct for employment purposes with some residential, noting that the site has been identified for standard density residential development within the draft Croskell PSP. Whilst generally supportive, the landowner makes the submissions as outlined herein.

The PSP seeks to provide, in the limited areas nominated for residential land use within the precinct, a mix of housing typologies and densities. The site is of a size, location, and with access to existing services, that makes it ideal for higher density housing. It is the landholder's vision to maximise the use of the site at 35 Bocker Street to its full extent, and this submission therefore advocates for an increased level of density on the site.

As outlined in this submission and previous submissions to the VPA, we submit that the site is well suited for a higher density of development. This standalone land pocket provides a unique opportunity to provide housing at higher densities to maximise the benefits of access to green space and amenity, activity centre and retail, active and public transport, and with limited impacts to existing established residential properties.

The submission makes the following key points:

- The landowner strongly supports the residential land use designation for the site.
- Development at a density substantially greater than the target specified in the draft Croskell PSP is considered appropriate for this location given its proximity to key amenities. The site is a strong candidate for a higher residential density than that proposed in the draft PSP, as it enables residents to meet all daily needs within a 20-minute walk. Its unique location provides easy access to supermarkets, the Selandra Rise Activity Centre (including medical and community services), open spaces like Clyde Creek wetlands, childcare and education facilities, as well as active and public transport options and proposed employment areas.
- As a minimum the land should be designated as a housing 'amenity area' within the PSP. Given the site's small size, adjacency to land designated for higher density, and separation from established areas, it is submitted that this land and the surrounding parcel are suitable for even greater density than the nominated 30 dwellings per hectare for amenity areas, notably 40+ dwellings per hectare could be supported in this location.
- Planning controls should be selected to facilitate this density of development. In this context, while the landowner supports the application of the General Residential Zone (GRZ), it is suggested that the Residential Growth Zone (RGZ) could be alternatively considered due to the site's excellent access to active and public transport, open space, retail, employment, community services, and schools, and having regard to the guidance provided in 'Planning Practice Note PPN91: Using the Residential Zones.'
- It is questioned why an acid sulfate soils assessment is required, as the background report indicates an extremely low likelihood of encountering such soils. Additionally, the need for an acoustic report is unclear, given the site's isolation from major roads and industrial areas.

Introduction

Beveridge Williams makes this submission to the Croskell (Employment) Precinct Structure Plan (PSP) and associated Amendment C296case on behalf of the landowner of 35 Bocker Street, Clyde North. The 8,095 square metre site is located within the southeast of the Croskell (Employment) PSP, with frontage to Bocker Street.

The draft PSP, as it relates to the AVA Faltaous-Kyrellos Pty Ltd land, proposes that the site be used for residential purposes.

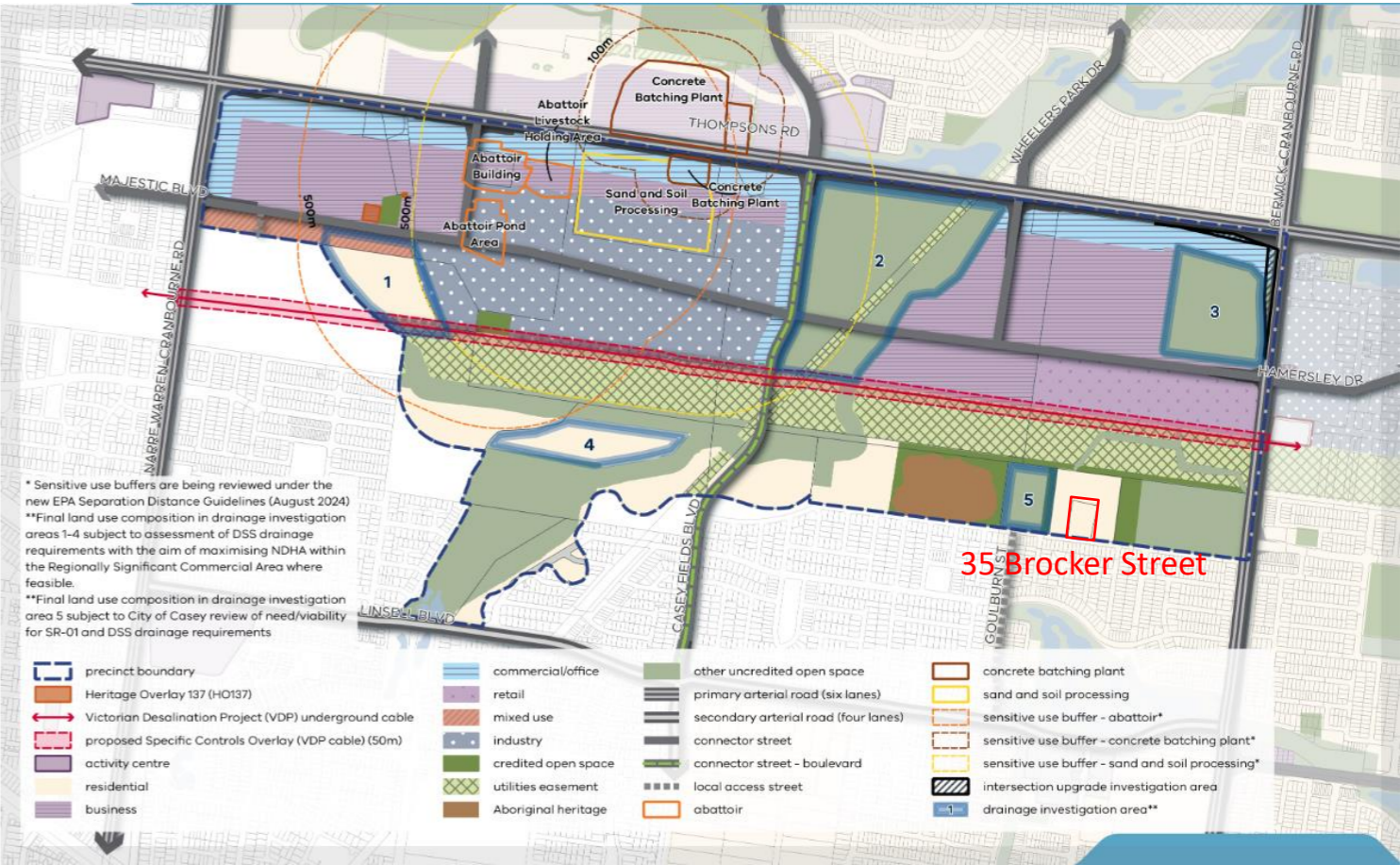
The planning scheme amendment known as C296case principally seeks to implement the draft PSP, the Croskell (Employment) Infrastructure Contributions Plan (ICP), and the Croskell (Employment) Native Vegetation Precinct Plan (NVPP). Amendment C296case seeks to apply several planning controls to the site at 35 Bocker Street to facilitate future use and development in accordance with the PSP Plan 2: Place Based Plan. The proposed controls include applying the:

- Urban Growth Zone - Schedule 16 (UGZ16) which implements the Croskell (Employment) Precinct Structure Plan.
- Infrastructure Contributions Plan Overlay – Schedule 4 (ICO4) to the whole site to apply the corresponding the Croskell ICP.

The existing Environmental Audit Overlay (EAO) will be retained on the site.

The amendment also proposes to amend the Schedule to Clause 52.17 Native Vegetation to include an exemption from permit requirements for native vegetation removal within the precinct where the land is within the Melbourne Strategic Assessment (MSA) areas.

Figure 1: Extract from PSP Plan 2: Place Based Plan (VPA 2024)



Subject Site and Surrounds

The subject site at 35 Bocker Street, Clyde North is generally rectangular in shape and has a frontage to Bocker Street of 70.22m and a depth of 105.23m-111.66m. The land has a total area of 8,094 sqm (0.81 ha). The property is currently developed with a single large dwelling and associated outbuilding on the land.

The subject site is located adjacent to an established residential area containing a mixture of densities, primarily conventional density lots of around 400sqm. The subject site and surrounding parcel of 37 Bocker Street are setback from this established residential area to the south. Bocker Street is a 16m wide local street, and the local road network has been designed to slow traffic along this frontage and to redirect traffic flows to the Frankland Street connector road.

Significant amounts of open space surrounds this pocket of future residential land, including the expansive electrical easement to the north, the Cascades On Clyde wetlands and park to the south, and the Council owned future active open space to the east and west. Being located within proximity to this green space provides great amenity and access to recreation and is ideal for higher density housing. The site also has excellent access to public and active transport, whereby Berwick-Cranbourne Road is approximately 418m from the site and is equipped with bus stops associated with Route 888. This north-south road, and the east-west electrical easement which forms part of the Principal Bicycle Network, provides active transport options to future residents. Good access to the arterial road network is provided by Berwick-Cranbourne Road via Frankland Street. The Selandra Rise activity centre is also within a walkable distance of less than 800m.

The site contains some planted vegetation around the dwelling. It is expected that most of the vegetation on the site will be removed to facilitate development consistent with the draft PSP.

The completed Cranbourne East PSP abuts Bocker Street to the south, with residential dwellings and parkland now well established within this area. Selandra Rise LocalTown Centre is located approximately 660 m south of the site and includes an existing supermarket, two childcare centres, dentist, and vet. The Cranbourne Major Activity Centre is located approximately 6 kilometres west of the subject site. The Future Cranbourne East Railway Station is within 2 kilometres of the subject site.

Figure 2: Site Context Aerial (NearMap 2024)



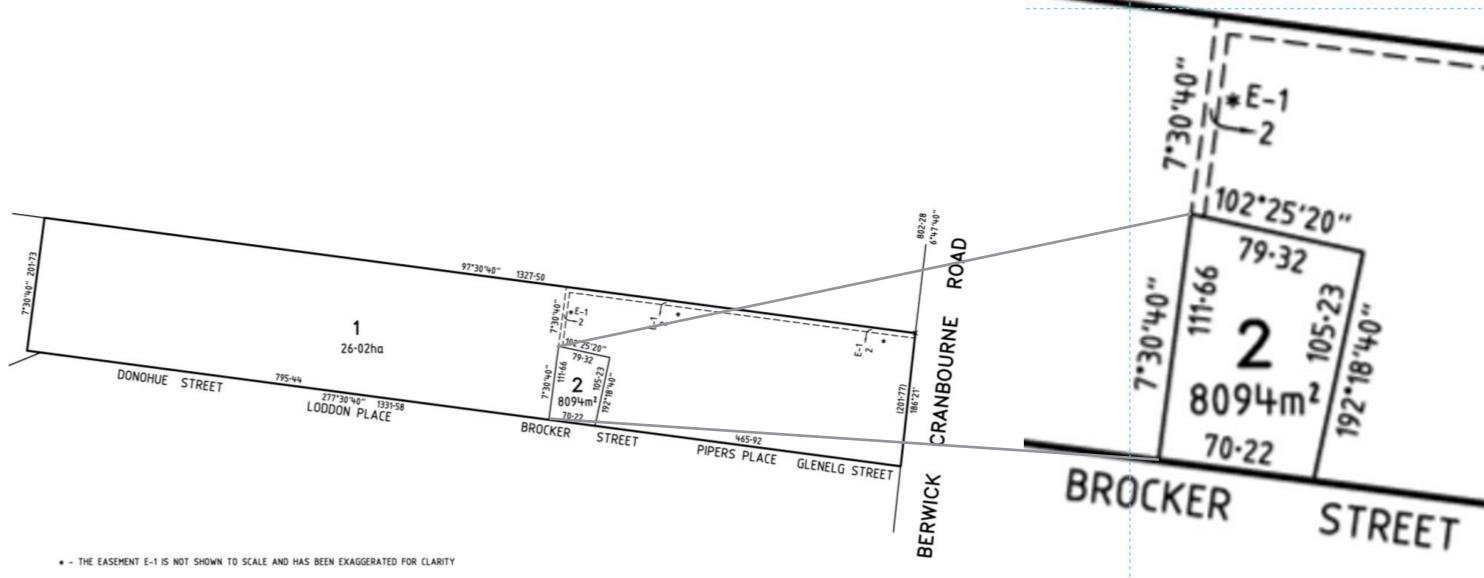
| Property Details                                 |                                   |
|--|-----------------------------------|
| Address  | 35 Bocker Street                  |
| Formal Description                               | Lot 2 on PS718150                 |
| Municipality                                     | City of Casey                     |
| Site Area  | 8,094m2                           |
| Zone   | Urban Growth Zone (UGZ)           |
| Overlay  | Environmental Audit Overlay (EAO) |
| Area of Aboriginal Cultural Heritage Sensitivity | Yes                               |
| Bushfire Prone Area                              | Yes                               |
| Melbourne Strategic Assessment Area              | Yes                               |

Title Details

35 Bocker Street is formally known as Lot 2 on PS718150. There are no easements present on the site however a drainage easement in favour of the site extends from the rear of the subject land through to Berwick Cranbourne Road.

A Section 45 notice is registered to the Certificate of Title, which relates to the application of the Melbourne Strategic Assessment Area. A Section 201UB is also registered on the Certificate of Title and relates to GAIC liability. Two Section 173 Agreements apply to the land and will be removed in due course, relating to a previous permit.

Figure 3: Extract from Title – Lot 2 PS718150



Existing Planning Controls

The land is located within the City of Casey and is subject to the provisions of the Casey Planning Scheme. The site is zoned Urban Growth Zone (UGZ), and no schedule currently applies. The Environmental Audit Overlay (EAO) applies to the land.

Clause 37.07 Urban Growth Zone

- The site is subject to the Urban Growth Zone (UGZ). The purpose of the Urban Growth Zone is:
- To manage the transition of non-urban land into urban land in accordance with a precinct structure plan.
  - To provide for a range of uses and the development of land generally in accordance with a precinct structure plan.
  - To contain urban use and development to areas identified for urban development in a precinct structure plan.
  - To provide for the continued non-urban use of the land until urban development in accordance with a precinct structure plan occurs.
  - To ensure that, before a precinct structure plan is applied, the use and development of land does not prejudice the future urban use and development of the land.

Pursuant to the current controls at Clause 37.07-1, a permit is not required for a dwelling, granted it is the only dwelling on the lot and the lot is at least 40 hectares. In accordance with Clause 37.07-3, a permit is required to subdivide land.

Clause 45.03 Environmental Audit Overlay

- The site is subject to the Environmental Audit Overlay (EAO). The purpose of the Environmental Audit Overlay is:
- To ensure that potentially contaminated land is suitable for a use which could be significantly adversely affected by any contamination

In accordance with Clause 45.03-1, before a sensitive use (e.g. residential) commences or before the construction or carrying out of buildings and works in association with the use commences, a Preliminary Risk Screen Assessment (PRSA) and an environmental audit statement are required.

Figure 4: Existing UGZ (Source: VicPlan)



Figure 5: Existing EAO (Source: VicPlan)



Draft Croskell (Employment) PSP & Proposed Planning Controls

Croskell (Employment) PSP

The draft Croskell (Employment) PSP is intended to support State and Government policy by delivering a large-scale, regionally significant employment precinct, along with a mix of housing typologies and densities. The draft PSP Vision notes that the Croskell (Employment) Precinct Structure Plan is an “infill” precinct that builds on the existing character of the surrounding Cranbourne East and Clyde North community.

The subject site is located in the southeast of the precinct. The draft PSP indicates that the subject site will support residential development in this location. As noted, **the landowner strongly supports the residential land use designation**. The PSP specifically identifies the land as suitable for a ‘balance’ target density of 20 dwellings per hectare, though **it is submitted that a higher density of development is appropriate in this location**.

The PSP proposes a number of shared path connections that provide access to future retail and employment areas and a connection to the Principal Bicycle Network within the powerline easement.

The PSP is informed by the Ti-Tree Creek Drainage Scheme, which is under review by Melbourne Water. Commentary on the draft DSS is provided within this submission and separately provided to Melbourne Water. It is noted that no drainage assets are proposed within the site.

Proposed Planning Controls

The draft planning scheme amendment proposes to apply the UGZ16. The subject land is proposed to be applied with General Residential Zone (GRZ) under the UGZ16 – this is the same zoning as the land located across Brocker Street to the south. **The landowner supports the application of the GRZ as the applied zone though submits that the Residential Growth Zone could also be considered given the site’s proximity to active and public transport, open space, retail, employment, community services and schools.**

The following assessments will be required to support a future application for development of the site:

- Hydrogeological assessment of groundwater
- Drainage and integrated water management plan
- Stormwater Management Strategy
- Landscape masterplan
- Acid sulfate soils report
- Housing and design guidelines
- Public infrastructure plan
- Traffic impact assessment
- Acoustic assessment
- Preliminary site investigation

**It is queried why an acid sulfate soils assessment is required where the background report states that there is extremely low probability of encountering acid sulfate soils. Further why an acoustic report is required, noting that this site is isolated from major roads and industry.**

It is noted that the Small Lot Housing Code will apply. This site could be a good candidate for the proposed Type C housing currently being considered within updated to the Small Lot Housing Code.

Other changes relevant to the land include application of the Incorporated Plan Overlay (ICO) to implement the Croskell ICP.

It is noted that the existing Environmental Audit Overlay (EAO) will be retained to the entire site.

Land use and density of development

The landowners of 35 Bocker Street generally support the draft PSP where it nominates land south of the powerline easement as future residential.

The PSP identifies the site as within a housing 'balance area' which requires the delivery of a mix of detached and semi detached dwellings of up to 3 stories. Terrace townhouses and multi-units are also possible where it can be demonstrated that it adds to planned character objectives (however no specific character objectives are stated in the PSP). The target density in the balance area is 20 dwellings per NDHa providing for around 16 dwellings the subject land. The surrounding land within 37 Bocker Street has been nominated in a different housing area – 'amenity area' – because it directly abuts open space. It has a target of 30 dwellings per NDHa.

The overarching goal of *Plan Melbourne 2017-2050*, is to create high-amenity, walkable neighbourhoods that meet the needs of a growing and diverse population. The concept of 20-minute neighbourhoods is embedded in the planning schemes and the VPA PSP Guidelines seek to implement this by aiming to promote sustainable and vibrant communities by setting housing density targets. They advocate for an average density of 30 dwellings per hectare around town centres and key areas of amenity, and a precinct-wide average of 20 dwellings per hectare, increasing to 25 over time. Higher housing density close to amenities aligns with the principles of the 20-minute neighbourhood, ensuring residents can access most of their daily needs within a 20-minute walk. Increased density supports the viability of local shops, services, and public transport, while promoting diverse and affordable housing options. The guidelines use an Amenity Model to direct density toward areas of open space, activity centres, community facilities, and public transport. This enhances walkability, connectivity, and the economic sustainability of local hubs, fostering diverse communities that benefit from proximity to key amenities.

**The site is a strong candidate to be considered for a higher density of residential development than nominated within the draft PSP, noting that future residents would be able to access all their daily needs well within a 20 minute walk. In particular, it is highlighted that it is a unique location within walking distance to:**

- **Supermarkets** – Aldi 615m to the northeast and Woolworths 650m to the south (15 minute walk)
- **Selandra Rise Activity centre including medical centre, community centre, pharmacy, cafes, restaurants, and retail** – 625m to the south (15 minute walk)
- **Open space** – proposed open space 60m to the north, east and west, Clyde Creek wetlands 210m to the south (5 minutes walk)
- **Childcare and education** – 500m to the east (6 minute walk) and 560m (13 minutes walk) to the south to childcare, 1.2km to several primary schools (25 minutes walk)
- **Active and public transport** – bus route 798 being 625m to the south (15 minute walk), and bus route 888 to Berwick being 500m to the east (6 minute walk), and located on the Principal Bicycle Network which extends through the powerline easement to the north of the site.

**It is submitted that the land should be nominated as a housing 'amenity area' with an increased density target of at least 30 dwellings per NDHa.** This would see a yield of at least 24 lots on this site. **Furthermore, it is submitted that the site lends itself well to an even higher level of density given the small size of the subject land and it being enveloped by the adjoining land envisioned for higher density and separated from the established area thereby managing offsite impacts.**

A concept plan has been prepared for the site which proposes high density townhouses on small lots at a density of around 40 dwellings per NDHa – 34 lots. Alternatively, the site could reasonably provide an even higher density, through the development of Type C small lots of 75-150sqm and up to three or four storeys, or a Future Homes style low rise apartment development.

Accordingly, **it is requested that planning controls are selected to facilitate a higher level of density development. It is submitted that Residential Growth Zone, may be appropriate in this instance, having regard to Planning Practice Note: PPN91: Using the residential zones,** and whereby the objectives of this zone are:

- *To provide housing at increased densities in buildings up to and including four storey buildings.*
- *To encourage a diversity of housing types in locations offering good access to services and transport including activity centres and town centres.*
- *To encourage a scale of development that provides a transition between areas of more intensive use and development and other residential areas.*

The Residential Growth Zone is applied to areas suitable for housing diversity and housing at increased densities in locations offering good access to services, jobs and public transport, and to provide a transition between areas of more intensive use and development such as activity centres, and other residential areas. The subject site meets these criteria and would be appropriate to be applied in this locations. It is noted that the zone sets a discretionary maximum building height of 13.5 metres applies to a dwelling or residential building, which would also be appropriate in this location.

Figure 6: Housing Density (Extract from Draft Croskell PSP Plan 3 )



Figure 7: Indicative Site Concepts for Townhouse Development



Beveridge Williams has prepared an indicative concept layout that considers the potential future requirements of the Croskell PSP as it applies to the subject site. The Concept proposes 33-34 lots at a rate of 42 lots per hectare. This concept assumes a central 16m local road to provide access to the lots. This can either provide a connection to the surrounding lot as shown or provide a cul-de-sac or other site-specific access. The site could alternatively lend itself to low rise apartment development akin to the Future Homes model of development.



Staging of the Precinct and Delivery of Infrastructure

Stormwater Drainage

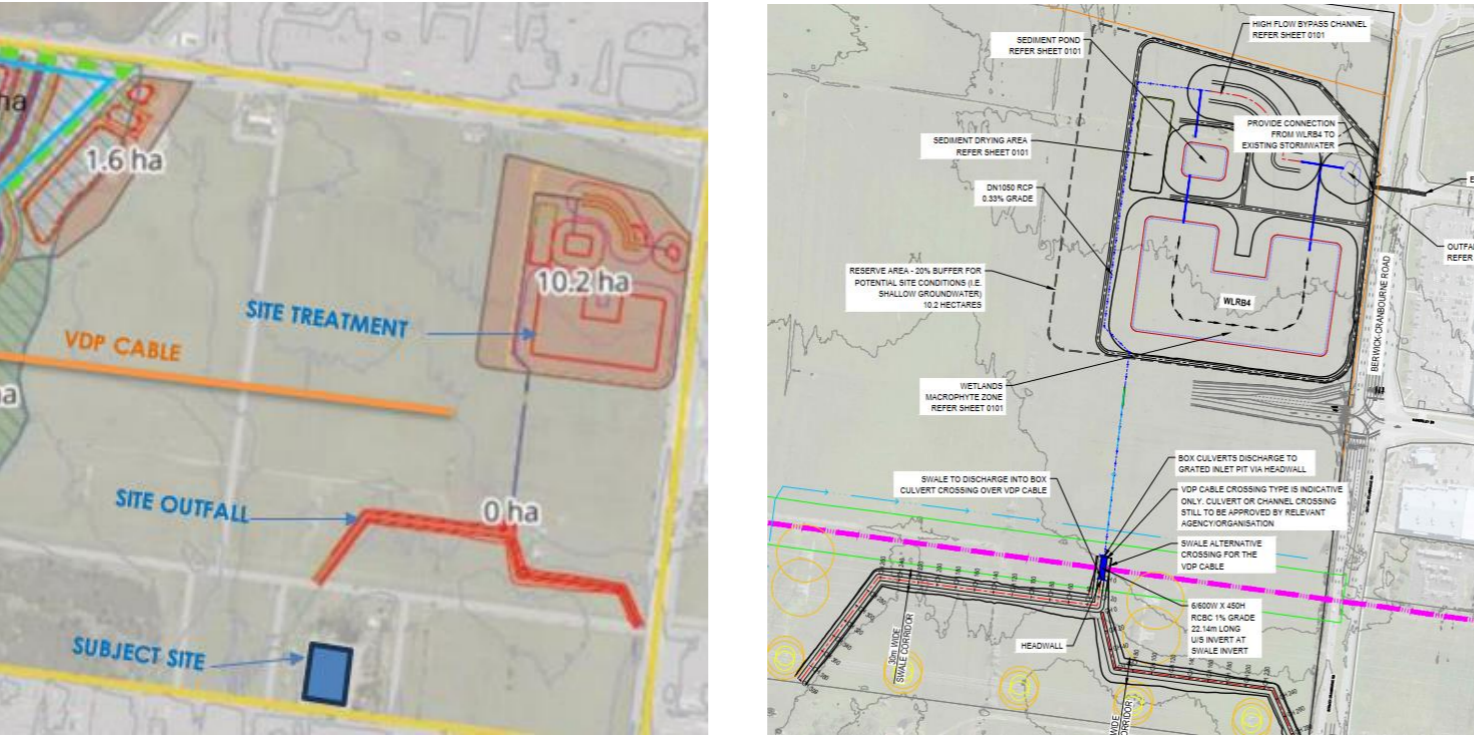
The subject site grades to the north and drainage will need to follow this grade as there is no capacity in the existing system to the south.

The subject site is encompassed by a horseshoe lot and a drainage outfall will need to be found through this site to the point of discharge nominated in the scheme.

The Melbourne Water Scheme (DSS) proposes an open drain to the north within the electrical easement as the site's legal point of discharge, which then consolidates to a single crossing point of the VDP cable. The crossing of this VDP cable is highly restricted and a major constraint on this PSP.

This drain then outfalls to a wetland/RB which provides treatment for the subject site.

Figure 8: Proposed DSS (Extract from Draft DSS)



- It is submitted that the the DSS does not sufficiently allow for the site and the following must be considered:
- It is noted the exhibited DSS documentation states the VDP cable crossing is not approved. The type of crossing appears inconsistent with other proposed crossings within the PSP. This creates a risk that this crossing will not be approved and the site will be left without an outfall. It is not reasonable to generate this risk within a DSS and this must be resolved.
  - In the western catchment, it is observed that the DSS is required to go to extraordinary lengths to manage crossing of the VCP cable with flows, but in the southeast of the precinct, there is no management proposed. This is inconsistent with the approach taken in the western part of the precinct and raises concern that this crossing does not meet requirements.
  - It is unclear why this crossing location was chosen. An existing drainage easement exists, connecting 35 Brocker Street with Berwick Cranbourne Road, avoiding the need to cross the VDP cable. Alternatively, there is an existing farm drain immediately west which could be utilised minimising the impact of development over the VDP cable. The eastern of the 2 swales does not appear to be servicing any new development and it is questioned why the existing drain is being diverted creating new loading over the VDP cable.
  - The subject site is also flagged for early development, as it is in isolation by the power easement. It is largely serviced by infrastructure to the south which has already been delivered under a previous PSP. Accordingly, this site should not be reliant on large scale drainage infrastructure such as the wetlands to deliver development. Utilising the existing farm drain will provide the best opportunity for a temporary outlet if the existing drainage easement cannot be utilised.

Beveridge Williams recommend the following as an alternative outfall for the site. Discharging flows into the existing farm drain and using a slight 500mm depression in the encumbered land beneath the powerlines to retard flows back to existing before crossing the VDP cable. An existing 1% AEP of 0.34cu.m/s was estimated from 35 and 37 Brocker Street combined, which outletting from the farm drain would be collected by the future development to the north. It was approximated that 700cu.m of storage would be required to retard flows from the development back to this existing level.

Figure 9: Alternative Drainage Outfall



Sewer

Sewer outfall for the draft PSP is proposed to the north. However, the subject site is isolated from the catchment by the overhead powerlines. For this site to be serviced to the north, it would require an enormous length of new infrastructure to the north to be constructed including crossing the VDP cable and easement. This is not determined as feasible from a sequencing or a cost perspective.

It is instead proposed that the site is serviced by sewer to the south. The below diagram demonstrates that in isolation, the subject site can be serviced by the existing DN150 to the south-east with minimal filling works. It is likely this filling will be required regardless for lot benching and drainage.

If needed, the proposed sewer outfall could be combined to service 37 Brocker Street.

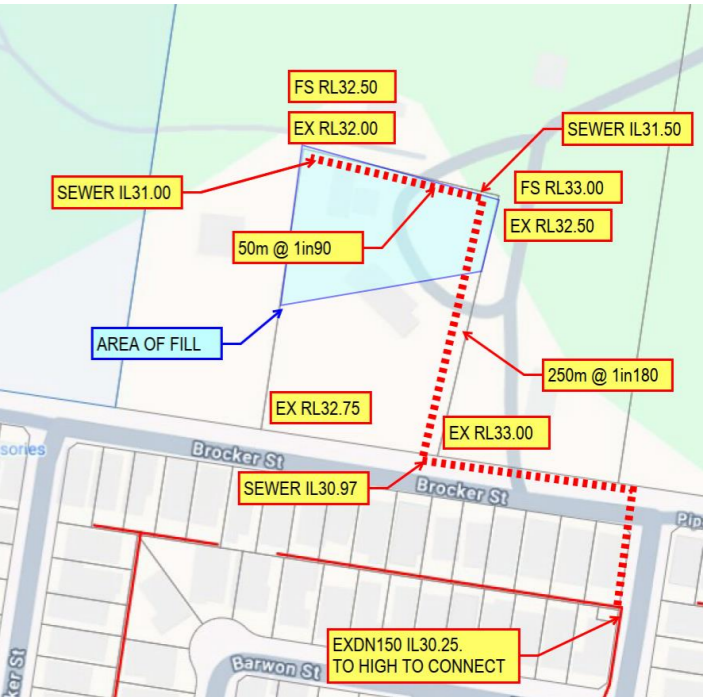
The preferred option will be at the discretion of South East Water masterplanning and dependant on sewer capacities, we ask this be assessed as a part of PSP masterplanning.

Other Services

Non-Gravity services including water, power and communications should also all be serviced from the south as there is no viable location to bring them in from new development from the north.

There are existing services available in Brocker Street which could be connected to. We ask that the capacity of these services be considered in authority masterplanning as a part of the PSP process.

Figure 10: Alternative Sewer



Conclusion

The landowners of 35 Bocker Street generally supports the draft Coskell PSP, which designates the land and surrounding parcels as residential.

The draft PSP currently identifies the subject site within the housing 'balance area,' aiming for a density of 20 dwellings per net developable hectare (NDHa), emulating established development across Bocker Street to the south, and equating to approximately 16 dwellings on this land. However, given the site's proximity to extensive open space, active transport networks, public transport, and its walking distance to both existing and proposed retail, employment hubs, and community facilities such as supermarkets, schools and childcare, together within it's relative isolation from established residential housing and ability to avoid potential offsite impacts, and it's ability to be serviced, the landowner strongly advocates for a higher density than that nominated in the draft PSP.

The site attributes exemplify the principles of a 20-minute neighbourhood and is better suited for at minimum an 'amenity area' designation, with a recommended target density of 30 dwellings per hectare, however it is submitted that a higher target is appropriate in this location.

The site is not constrained by the need to manage impacts on established residential development to the south by virtue of its isolation across Bocker Street. An indicative concept plan prepared for the site demonstrates that the site can support a density of approximately 40 dwellings per NDHa, translating to 33 small-lot townhouse units. While the draft planning scheme amendment proposes the application of the General Residential Zone (GRZ) under UGZ16, it is submitted that the Residential Growth Zone (RGZ) would be more appropriate for this location, enabling higher density development commensurate with its well serviced and highly accessible location.

Furthermore, the site is not dependent on the delivery of drainage scheme assets outlined in the PSP sequencing plan. It can connect to existing infrastructure services to the south, and an interim drainage solution is readily available. Therefore, this site should not be subject to precinct-wide staging constraints.





Notes:

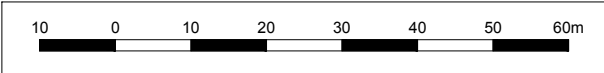
- This plan was prepared as a **PROPOSAL** only and should not be used for any other purpose.
- This plan is subject to Council approval.
- All dimensions and areas are subject to survey and final computations.
- Existing drainage directions shown are approximate only and subject to a detailed storm water management investigation.
- Further investigation may be required for fire buffers, vegetation retention and removal, site access and egress, and aboriginal and cultural heritage.
- All roads are 16m local access level 1 unless noted otherwise.
- Road pavement is indicative only.
- Arc dimensions shown are length of arc (not chord)
- This plan boundaries are based on VICMAP data only and subject to survey.

|                             |  |          |
|-----------------------------|--|----------|
| Site (Approx.) VIC MAP only |  | 0.810 ha |
| * Residential Lots          |  | 0.636 ha |
| * Non-Arterial Roads        |  | 0.175 ha |
| Net Developable Area        |  | 0.810 ha |
| Lot Yield                   | 34 lots @ 42 lots per ha<br>187m <sup>2</sup> average lot size |          |

\* Indicates inclusion in NDA

LEGEND

- Development Plan boundary (approx.)
- Residential lots
- Naturestrip (indicative)
- Road pavement (indicative)



Indicative Subdivision Plan  
35 Brocker Street, Clyde North  
AVA Faltaous-Kyrellos Pty Ltd

**DRAFT**

FOR DISCUSSION PURPOSES ONLY

|         |            |             |         |          |  |
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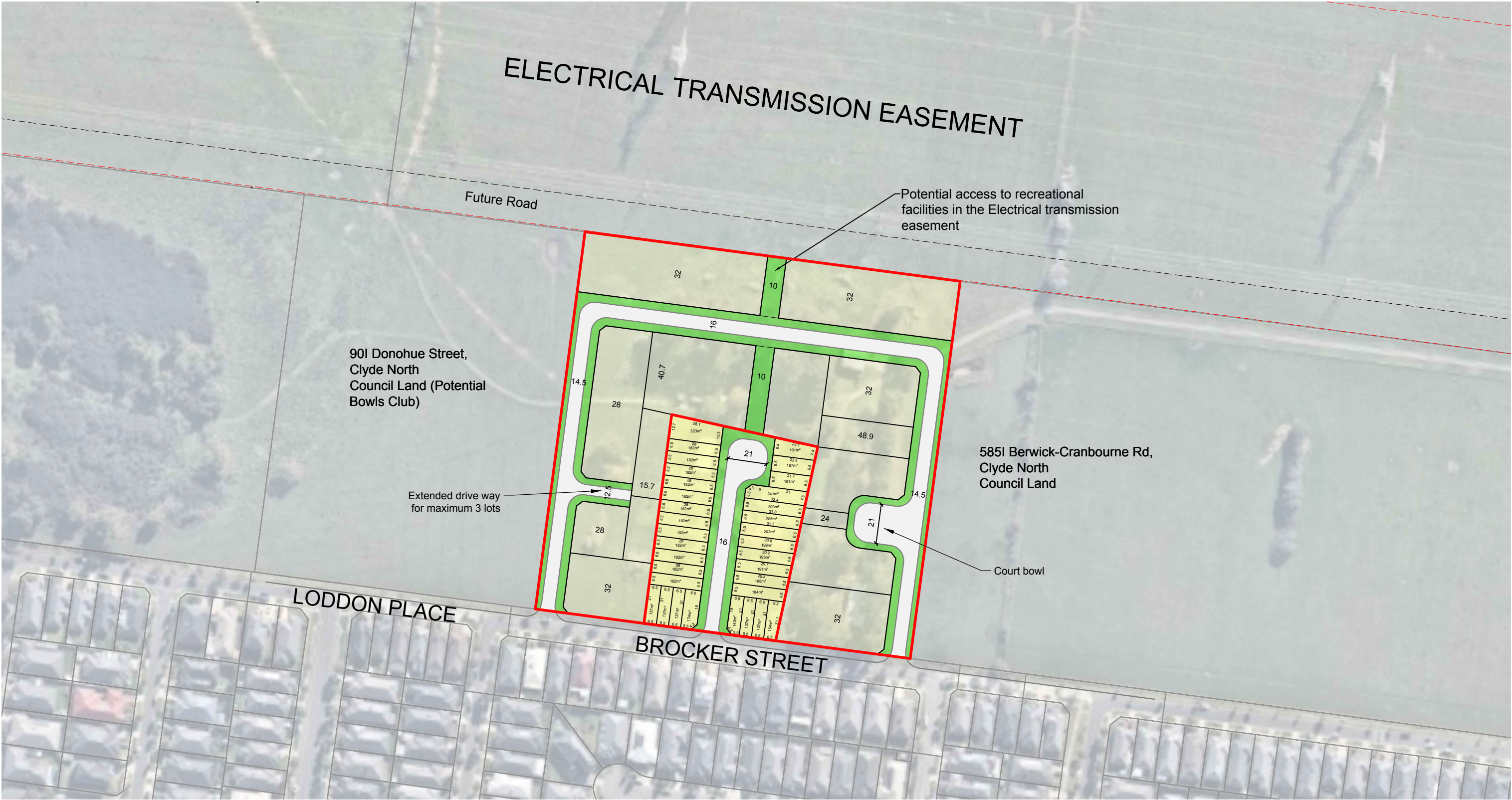
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- Arc dimensions shown are length of arc (not chord)
- This plan boundaries are based on VICMAP data only and subject to survey.

|                             |  |          |
|-----------------------------|--|----------|
| Site (Approx.) VIC MAP only |  | 0.810 ha |
| * Residential Lots          |  | 0.603 ha |
| * Non-Arterial Roads        |  | 0.207 ha |
| Net Developable Area        |  | 0.810 ha |
| Lot Yield                   | 33 lots @ 40.7 lots per ha<br>183m <sup>2</sup> average lot size |          |

\* Indicates inclusion in NDA

LEGEND

- Development Plan boundary (approx.)
- Residential lots
- Naturestrip (indicative)
- Road pavement (indicative)

