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Executive Summary

Wagstaff is generally supportive of the exhibited PSP and its facilitation of the development of the precinct for employment purposes, however makes the submissions as outlined herein.

Wagstaff intends to retain the abattoir use of the land having been successfully operating in the area for many years and has invested heavily in plant and equipment upgrades over recent years. The abattoir will continue to benefit from its location on the Principal Freight Network and will benefit from the maintenance of industrial land use buffers and the potential to establish complimentary industries on surrounding land. As such, Wagstaff submit that the Croskell PSP should be designed to accommodate the continuing presence of the abattoir.

With this in mind, Wagstaff makes the following key submissions to the exhibited PSP and associated planning scheme amendment:

- Wagstaff submits that it is important to ensure that the necessary industrial buffers are maintained in the planning of the precinct. Wagstaff submits that it is critical that a buffer of at least 707m be maintained in the PSP from the wastewater aerobic pond and 1000m from the abattoir, and not be reduced from those currently reflected in the planning scheme as established for the Cranbourne East Development Plan and Cranbourne North Development Plan. Accordingly, Wagstaff submit that the plans in the draft PSP be updated to reflect the necessary buffer as established by the EPA Separation Distance Guidelines.
- Wagstaff notes the draft PSA requirement for a planning permit for any sensitive use within the abattoir buffer
 area, along with the requirement for an application for a sensitive use to provide an Odour Environmental Risk
 Assessment. However Wagstaff submits that sensitive uses muse be prohibited from establishing within the
 necessary buffer, noting that there have been recent encroachments into the buffer area to the south west of
 the site where flexibility has been allowed under relevant planning controls.
- Appropriate separation of sensitive land uses should be facilitated by the appropriate nomination of land uses within thePSP. The draft PSP nominates large areas of land as future residential within the previously adopted and proposed buffer.
- Wagstaff submits a logical and functional alternative road layout to minimise impacts on the abattoir and to
 ensure that these key roads and intersections can be delivered, and requests that this be reflected in the PSP.
- Wagstaff submit that the Melbourne Water DSS proposal to divert the western sub-catchment to the east will
 provide a poor outcome, restricting development potential and placing unreasonable costs onto the
 developers. The key issues with the proposal include:
 - Unrealistic earthworks quantities
 - Unmanageable level differences
 - Restrictions on the sequencing of development
 - Protection of major roadways
 - The open space adjacent the electrical easement would obstruct the flow path.
- Wagstaff submits that it is important to allow for temporary / interim solutions to manage drainage, given that
 the staging and delivery proposed by the draft DSS. Whilst Wagstaff supports the apparent flexibility proposed
 in R36, it is submitted that the draft PSP lacks clarity regarding the circumstances in which an alternative or
 temporary solution would be agreed.
- Restrictive staging of the precinct should not be applied, enabling the bringing forward of key infrastructure in strategic locations for the benefit of the wider precinct, and enabling larger landholdings with the capacity to undertake works in kind to proceed early in the development of the precinct.



Introduction

Beveridge Williams makes this submission to the Croskell Precinct Structure Plan (PSP) and associated Amendment C296case on behalf of the landowner of 1500 Thompsons Road, Cranbourne East, Wagstaff Cranbourne Pty Ltd (Wagstaff). The 24 hectare site is located within the northwest of the Croskell Employment PSP with frontage to Thompsons Road.

The subject land is used as an abattoir. Wagstaff is an Australian owned and operated family business that has been processing red meat since the early 1900s, and is one of Australia's largest meat processors, packers and exporters, employing 380-400 staff in this site. Wagstaff supply quality Australian meat products (Beef, Lamb and Veal) for both domestic and export markets. Following a catastrophic fire at the Cranbourne abattoir in 2013, the plant was rebuilt with a significant investment in state of the art plant and equipment. Wagstaff now has the capacity to process up to 12,000 units per day and there are ongoing works to further improve plant efficiency and capacity. As communicated to the VPA throughout the preparation of the PSP, Wagstaff intends to remain at the site for the foreseeable future.

The draft PSP, as it relates to the subject land, proposes that the land be used for a combination of business, commercial/office, and industrial use. Land in the north of the site, fronting Thompsons Road, is proposed to be used for commercial/office purposes and land in the south of the site is earmarked for industrial use. The draft PSP also proposes a north-south connector road with intersection to Thompsons Road, and an east-west connector road, both of which bisect the site.

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 a number of planning controls to the site at 1500 Thompsons Road to facilitate the 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 applies the Croskell Employment Precinct Structure Plan.
- Environmental Audit Overlay (EAO) to land within the precinct nominated as having high potential for contamination.
- Infrastructure Contributions Plan Overlay Schedule 4 (ICO4) to the whole site to apply the corresponding Croskell ICP

The amendment also proposes to amend the Schedule to Clause 52.17 Native Vegetation to include native vegetation removal exemptions for Melbourne Strategic Assessment (MSA) areas within the PSP. The subject land is noted as being within the MSA area.

An abattoir can coexist comfortably in an industrial setting, and in fact will benefit from the industrial buffers that a well planned industrial precinct provides, as well as from the potential for surrounding land to be developed for supporting and associated industries. Wagstaff may also subdivide some excess land for industrial development in accordance with the PSP. Wagstaff therefore submit that the Croskell PSP should be designed to accommodate the continuing presence of the facility on the site. An indicative concept for the future development of the site shows how road access can be accommodated in the context of the abattoir remaining on site, whilst facilitating some further be subdivided off. This plan also creates a pathway for the future relocation of the abattoir from the site at the most appropriate time in the future.

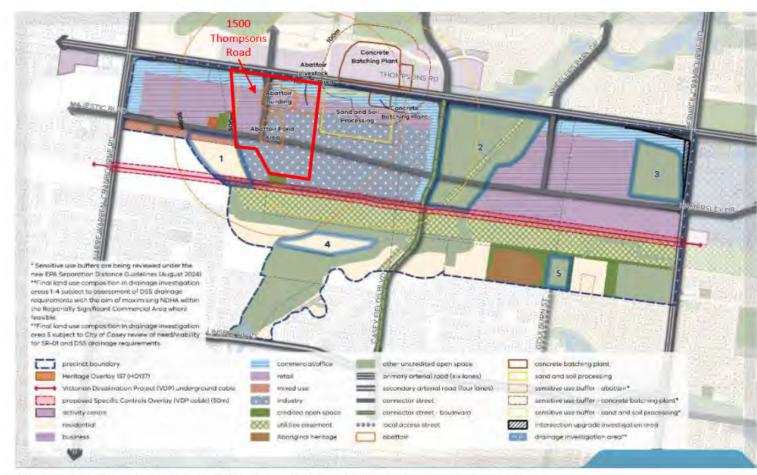


Figure 1: Croskell PSP Plan 2: Place Based Plan (Source: Victorian Planning Authority, September 2024)

Subject Site and Surrounds

The site at 1500 Thompsons Road, Cranbourne East is located approximately 2.2 km north-east of the Cranbourne Major Activity Centre and Cranbourne Train Station. The site contains the currently operating Wagstaff Abattoir. The site comprises an existing building used for operations, livestock holding pens, a wastewater treatment system, and a large carpark in the north-east corner of the land. A small dam is located in the south-east corner of the site. The property has long been used as an abattoir, with Wagstaff commencing operations of their Cranbourne plant in the early 1900s.

The site contains vegetation along the western and southern boundaries and four scattered trees are identified within the MSA mapping of the site. Access is provided to the site via a turning lane from Thompsons Road, which gives way to the site carpark and an unsealed driveway leading to the main building.

The surrounding area contains a mix of residential, agricultural land, and industrial land. Directly to the east of the site at 1520 Thompsons Road is a former quarry and at 1550 Thompsons Road is the Boral concrete batching plant which is currently in operation. The site to the west, 1450 Thompsons Road, is currently used for agricultural purposes (crop-raising). Further afield are the established areas of Cranbourne and Cranbourne North, with residential development existing approximately 260 metres from the southernmost part of the subject site, and approximately 650 metres from the activity boundary (i.e., the abattoir building).

The site is within the north-western corner of the Croskell Employment PSP. It is surrounded to the north by the predominately residential Cranboune North PSP and to the east by the predominately residential Thompsons Road PSP. Whilst the PSPs are both predominately residential, it is noted that land directly to the north of Thompsons Road within the Cranbourne North PSP is earmarked for commercial purposes (the Cranbourne North Service Business Precinct) to maintain appropriate buffers to the residential area.

At present, the Cranbourne North PSP (Stage 1) appears to be in the early stages of development with visible earthworks occurring north of Thompsons Road, as shown in Figure 2.

Title Details

The land is formally known as Lot 5 on Plan of Subdivision 729806 and Lot 1 on Title Plan 113854. The site is irregular in shape, with a total area of approximately 24.054 ha. The property has frontage of 523 metres to Thompsons Road.

The title for Lot 5 PS729806 shows a caveat on title, with Ausnet Electricity Services Pty Ltd as the registered Caveator.

Both titles contain a notice relating to the Melbourne Strategic Assessment program.

No easements or restrictions are observed on either title.



Figure 2: Subject Site and Surrounds Aerial Image (Source: Nearmap, 1 August 2024)

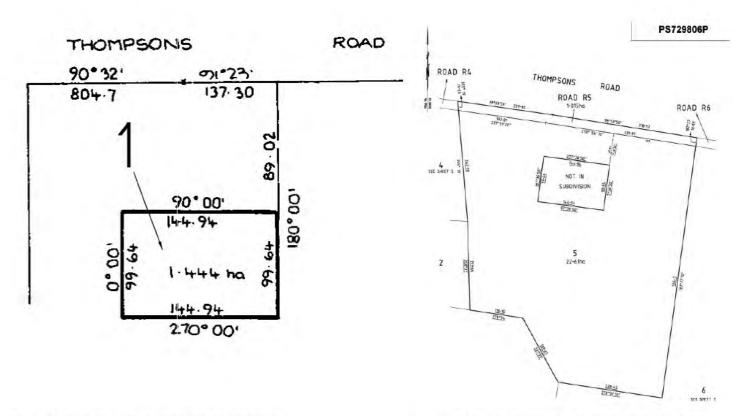


Figure 3: Extract of Certificate of Title (Lot 1 TP113854)

Figure 4: Extract of Certificate of Title (Lot 5 PS729806)

Existing Planning Controls

The subject site is located within the City of Casey and is subject to the provisions of the Casey Planning Scheme. The site is entirely within the Farming Zone (FZ).

The frontage of the site to the north is subject to the Public Acquisition Overlay – Schedule 1 (PAO1) for the purposes of widening of Thompsons Road. Thompsons Road is zoned Transport Zone 2 (TZ2).

The planning controls are detailed below.

Clause 35.07 Farming Zone – Schedule 2 (FZ2)

The site is subject to the Farming Zone – Schedule 2 (FZ2). The purpose of the Farming Zone is:

- To provide for the use of land for agriculture.
- To encourage the retention of productive agricultural land.
- To ensure that non-agricultural uses, including dwellings, do not adversely affect the use of land for agriculture.
- To encourage the retention of employment and population to support rural communities.
- To encourage use and development of land based on comprehensive and sustainable land management practices and infrastructure provision.
- To provide for the use and development of land for the specific purposes identified in a schedule to this zone.

Under the provisions of the Farming Zone, a planning permit is required to subdivide land. The minimum subdivision area applicable to the subject site is 40ha. In accordance with the Schedule, the minimum setback from a boundary is 5 metres for buildings. The Farming Zone remained as such despite the surrounding rezoning of land to Urban Growth Zone, due to the buffer requirements of the nearby abattoir and concrete batching plant to the east of the site. The site will be rezoned to Urban Growth Zone (UGZ) as part of the Croskell PSP process to implement the final PSP.

Figure 5: Existing zoning (Source: VicPlan, 2 October 2024)



Draft Croskell PSP & Proposed Planning Controls

Croskell (Employment) PSP

The draft Croskell (Employment) Precinct Structure Plan (PSP) is intended to support State and Government policy by delivering a large-scale, state and regionally significant employment precinct, and which will deliver more intensive forms of employment uses including service industries, office and commercial activity, research and development and some large format retailing, consistent with the South East Economic Corridor Report 2060 and the Melbourne Industrial and Commercial Land Use Plan.

The PSP provides for a regionally significant commercial precinct with an estimated 6,532 jobs, which will leverage the precinct's strong connections to other employment areas in the south east, including the Dandenong National Employment and Innovation Cluster and the Officer South State Significant Industrial Precinct. The draft PSP envisages that the precinct will play a key role in supporting local employment aspirations and the types of businesses that locate in the precinct are expected to commence with light industrial, retail and service uses that will gradually transition towards higher order office and commercial uses over time within designated areas along key frontage roads.

The subject site is located within the northwest of the draft PSP area. It is proposed that office/commercial land uses of a medium to large scale with high quality-built form and uses that facilitate evening activation will be concentrated along this northern part of the site fronting Thompsons Road. A general business area is proposed behind this, envisaged to support a variety of commercial, manufacturing, retailing and business uses, with industry to be located further behind within the south of the site (envisaged as small scale industry with limited sensitive use impacts such as warehouses and logistics). A 500m sensitive use buffer is proposed to be applied around the abattoir site. As noted elsewhere in this submission, this buffer is considered inadequate.

Thompsons Road is a key east-west arterial road as part of the Principal Freight Network. A shared path will be required to be delivered along Thompsons Road frontage. The draft PSP also proposes a north-south connector road with intersection to Thompsons Road, and an east-west connector road, both of which bisect the site. An east-west connector road is proposed through the southern part of the site, with entry via adjoining land to the east and west.

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 PSP will be applied by a new Schedule 16 to the Urban Growth Zone. The draft UGZ16:

- Applies the Industrial 3 Zone to the southern part of the site (and which will contain the wastewater lagoon)
- Applies the Commercial 2 zone to the northern and western part of the site (and which will contain the abattoir plant)

It is noted that the draft UGZ16 requires a planning permit for any accommodation where it is propped within the abattoir buffer. This affects land within the residential areas to the west and south of the site, despite those uses being otherwise as of right within the applied zoning for those areas. Wagstaff submits that sensitive uses should be prohibited within the abattoir buffer area. This is best achieved by appropriate nomination of acceptable land uses and applied zoning.

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
- SWMS
- Landscape masterplan
- Acid sulfate soils
- Public infrastructure plan
- Traffic impact assessment
- Preliminary site investigation
- Arboricultural report

Other changes relevant to the land include:

- Application on an Environmental Audit Overlay (EAO) to the entire site
- · Application of the Incorporated Plan Overlay (ICO) to implement the Croskell ICP



Land Use & Buffers

History of the Abattoir Buffer

As part of the GHD report 'Cranbourne East & Casey Central – Assessment of Buffer Distances Final Report, July 2004' which informed the preparation of the Cranbourne East Development Plan and associated planning scheme amendment C77, a site-specific buffer assessment of the Wagstaff abattoir was undertaken and identified that a 1150m buffer was appropriate. However, the Panel to C77 was advised that a subsequent assessment undertaken for Stockland in 2005 using odour emission rates specific to the type of treatment plant used at Wagstaff identified a reduced buffer of 660m. The Panel was also advised that if connected to sewer, with the associated reduction of odour from the wastewater management system aerobic pond, the buffer could be further reduced to as little as 280m.

The uncertainty regarding the buffer and impact of potential connection to sewer resulted in the land within 500m of the aerobic treatment pond being retained within the Farming Zone and excluded from the Cranbourne East Development Plan, and land within 700m of that point being subject to further assessment where the Development Plan requires that permit applications should be referred to the EPA. The Cranbourne North Development Plan similarly adopted a 500m separation distance from the abattoir and a 700m separation distance from the wastewater treatment system. It is further noted that the wastewater treatment system and its proposed upgrades were the subject of VCAT proceedings, which confirmed the buffers and allowed the works.

Despite this adopted 700m buffer, we understand that a site specific buffer study prepared for the 'E>ST' estate (formerly known as 280 Narre Warren Cranbourne Road) to the south of the powerline easement and submitted to Council concluded that the buffer requirement was significantly less than the default 500m, such that dwellings have now been approved approximately 430m from the Wagstaff wastewater treatment system. If is not known if the EPA were referred the assessment. Wagstaff have not seen these assessments or been provided the opportunity to comment on this encroachment and remain concerned regarding the potential impacts these will have in ongoing operations.

Wagstaff reiterate that they do not intend to cease operations at the site, and that operations will continue for the foreseeable future. In fact, the abattoir has approved plans to further expand the facility. An abattoir can coexist comfortably in an industrial setting, and in fact will benefit from the industrial buffers that a well planned commercial and industrial precinct provides, as well as from the potential for surrounding land to be developed for supporting and associated industries. Wagstaff submits that it is important to ensure that the necessary buffers are maintained in the planning of the precinct to protect existing industries such as the abattoir and future industrial uses.

Determination of Buffer Extent

The VPA's background report which considers the necessary buffer requirements, Croskell PSP Land Capability Assessment (Kleinfelder, March 2023) advises the default 500m buffer for sensitive uses from the abattoir should be adopted. It does not appear to consider the previous conclusions of the Planning Panel for C77 and has not undertaken any site specific assessment of the buffer requirements. This is a significant omission, given that the extent of land remaining in the FZ was so specifically due to the buffer constraints.

The Kleinfelder report does recommend further investigation into the water treatment activities and general operating processes at the Wagstaff abattoir and highlights that it may be possible to reduce the buffer depending on wastewater flows and activities undertaken at the site.

Wagstaff have engaged GHD Pty Ltd to undertake a site specific buffer assessment to confirm the necessary extent of the buffer. A copy is attached at Appendix C.

From the information provided, two separation distances apply to the site in accordance with the EPA Separation Distance Guideline (August 2024):

- 700 metres from the aerobic pond in accordance with Appendix B Separation distances for odour emissions from wastewater treatment plants for Aerobic pondage system (determined from the envelope of the aerobic pond)
- 1,000 metres from the abattoir operations in accordance with 'Land used to slaughter animals with outdoor or exposed animal holding and loading areas > 10,000 standard animal units (SAU)/day' (scribed from the envelope of the abattoir building and outdoor animal holding areas)

The separation distances are based on the provided 20,000 equivalent population for the wastewater system and maximum SAU process figure of 12,000 over two shifts. Given the possibility of the two shifts then the larger separation distance would apply to account for maximum operations. If only one shift is considered i.e. 6000 SAU then the distance for the abattoir component would reduce to 790 metres (based on a linear interpolation of EPA categories).

Wagstaff submits that it is critical that a buffer of at least 707m be maintained in the PSP from the wastewater management aerobic pond and 1000m from the abattoir, and not be reduced from those currently reflected in the planning scheme as established for the Cranbourne East Development Plan. Wagstaff submits that the 'sensitive use buffer – abattoir' shown on the plans should be updated accordingly to incorporate these buffers for the plant and aerobic pond.

Buffer Planning Controls

The proposed planning scheme amendment requires a planning permit for any accommodation within the buffer to the abattoir, and also includes the following requirement:

"While the abattoir at 1500 Thompsons Road, Cranbourne continues to operate, an application to use or subdivide land, or to construct a building or construct and carry out works on land for a sensitive use (including accommodation, education centre place of assembly or public open space) located within 'sensitive use buffer - abattoir buffer' identified on Plan 1 of this Schedule and Plan 1 – Place Based Plan in the incorporated Croskell (Employment) Precinct Structure Plan must be accompanied by an Odour Environmental Risk Assessment prepared by a suitably experienced and qualified person to the satisfaction of the responsible authority, in consultation with the Environment Protection Authority. The Odour Environmental Risk Assessment must be prepared in accordance with EPA Publication 1883 Guidance for assessing odour (June 2022) and EPA Publication 1881 Guidance for field odour surveillance (May 2021) and acknowledge existing abattoir operations and assess the potential adverse amenity impacts of the abattoir on the future proposed sensitive use of the land.

If the responsible authority determines that there are likely to be odour levels arising from an abattoir which would have a detrimental impact on the amenity of the sensitive use, the land must not be developed for sensitive uses."

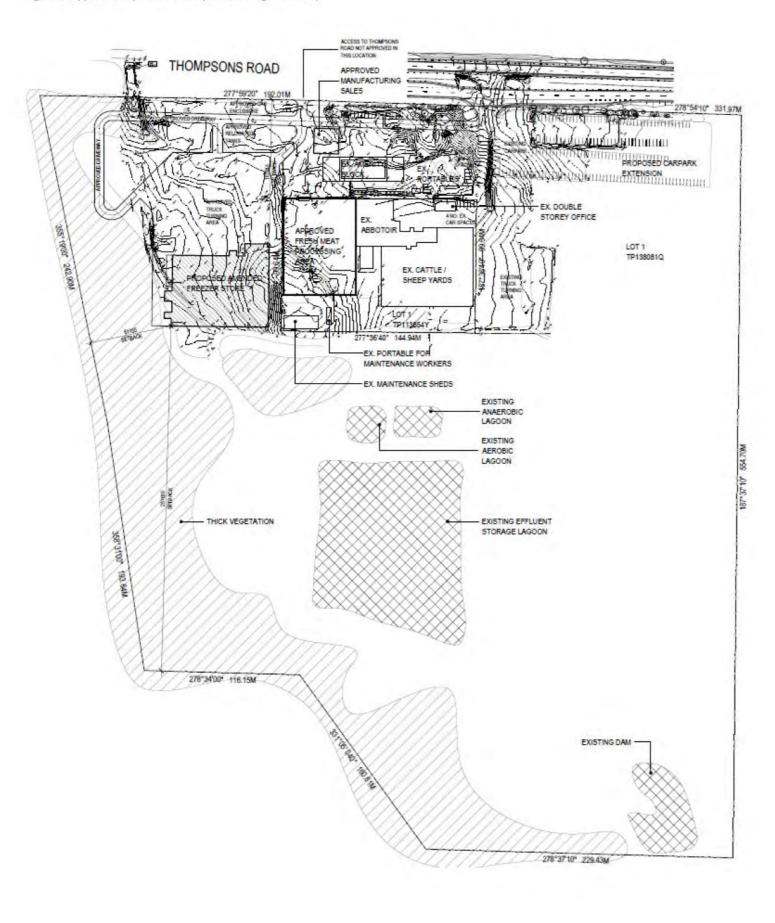
It is noted that despite a similar requirement existing in the Cranbourne East Development Plan, dwellings have been approved just 430m to the southwest of the lagoon.

Wagstaff opposes the decision to locate proposed residential land within the statutory buffers and submits that appropriate land use designation in the PSP and application of appropriate land use zoning should be utilised to manage the necessary transition.

The proposed approach in the draft PSA is consistent with the State government's 'agent of change' principle applied to existing industry. This principle puts the onus on the applicant proposing a new use or development that encroaches within buffers of an existing industry to take measures to mitigate any impacts from those existing or planned activities. However, it is inherently difficult to mitigate odour, except through appropriate land use planning and application of appropriate land use zones, to prohibit sensitive uses.

The PSP as currently drafted proposes large areas of residential land and mixed use land well within the previously adopted and proposed buffers. The trigger of a planning permit for accommodation within the abattoir buffer is acknowledged by Wagstaff, along with the requirement for an application for a sensitive use to provide an Odour Environmental Risk Assessment. However, it is submitted that the draft PSP and associated draft PSA must be amended to prohibit sensitive uses within the abattoir buffer.







Issued: 31/10/2023 Contact:



Roads and Access

The proposed Intersection IN-1 and east-west Connector Road have been aligned in the draft PSP such that they cannot be delivered. Wagstaff have previously submitted to the VPA a feasible design (Appendix A) that proves that the Wagstaff plant can continue to operate during the transition of the development of the land with the precinct. The VPA road layout has not changed for many years and Thompsons Road duplication has been designed with future cross intersections in mind. The primary cross intersection will be at William Thwaites Boulevard / Casey Fields Boulevard. A secondary cross intersection will be at Wheelers Park Drive and another at Medley Drive on the subject site's frontage. It is noted that Medley Drive will not provide a connection very far to the north of Thompsons Road.

Intersection IN-1 Alignment

A straight extension of Medley Drive to the south would intersect with the existing abattoir buildings and plant and run just to the west of and impacting the existing wastewater pond. The road alignment would also directly impact approved permits and plans for an extension to the abattoir including manufacturing sales building and freezer store.

The traffic projection for the Medley Drive extension is a daily volume of 3,400 vehicles split 1,700 north and 1,700 southbound. As a comparison Casey Fields is estimated to carry 17,000 vehicles per day and the extension of Wheelers Park drive 4,400 vehicles per day.

Wagstaff made submissions to the VPA during the course of the preparation of the PSP, including confirming Wagstaff's intention to remain on the land, information on the approved permits to expand, and provided a proposed concept that illustrated how the intersection could be designed and delivered.

The plan prepared by Beveridge Williams shows a Road C with a slight curve in alignment to the south of Thompsons Road of approximately 30 metres to have it pass to the west of the abattoir buildings and then continue to the west of the storage pond to intersect with Road B (east-west connector). This proposal would require some relocation of secondary buildings on the abattoir site but can be reasonably accommodated.

Figure 8: Extract from Intersection IN-1 Concept Design (Source: Croskell ICP Concept Design and Costs (SMEC) September 2024)

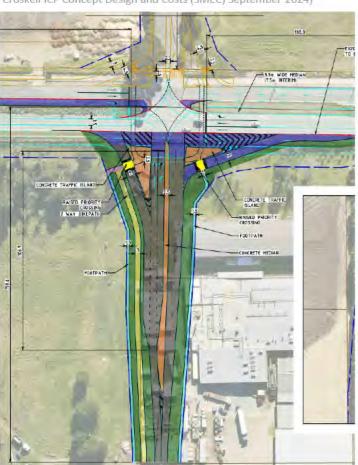
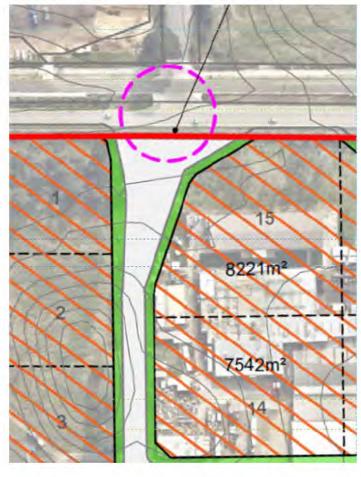


Figure 9: Extract from Indicative Concept Plan for 1500 Thompsons Road (Source: Beveridge Williams, full plan Appendix A)



East-West Connector

The seeming conflict in the Croskell PSP road network and the abattoir lagoon location is not necessary. Road B as illustrated in the Wagstaff Concept corresponds in function with the VPA connector road running east-west through the PSP but it is located 40-50 metres to the south to be clear of the storage pond. The realignment of Road B to the south of the storage pond would not change its function and it would still serve as the VPA connector road running east-west through the PSP.

Significantly, Wagstaff has previously made a submission to the VPA which demonstrates how the alternative alignment of the east-west connector can be coordinated with other developers within this precinct.

Additional left in left out connection

There are a few properties on the southern side of Thompsons Road that have access via left in and left out arrangement. This includes the adjoining land at 1520 Thompsons Road, where there is a driveway (25 metres wide) running parallel to the proposed Medley Drive extension approximately 180m to the east of the abattoir site. This driveway does not appear on the VPA plans as it would fall into the category of a local access road, although the 25m road reserve could also support a connector road. This local access road would connect to Thompsons Road and potentially be restricted to left in and left out.

The BW plan also shows a Road D running parallel with Road C connecting Thompsons Road and Road B approximately 180 metres to the east of the abattoir site. This road is clearly within the existing driveway that runs to the south of Thompsons Road in 1520 Thompsons Road. The addition of the road to the east of the abattoir site in 1520 Thompsons Road is also logical as it would serve as a local access road being most likely restricted to left in and left out.

Wagstaff submits that the road layout proposed as an alternative to the PSP layout, as shown in the Wagstaff Concept Plan herein, is logical and will provide the same function as the roads proposed in the PSP whilst minimising impacts on the abattoir and ensuring that these key roads can be delivered, and should be reflected in the PSP.

Figure 10: East-West Connector alternative alignment - proposed to divert south to avoid Wagstaff Aeriation Wastewater Lagoon (Source: Beveridge Williams, full plan Appendix A)

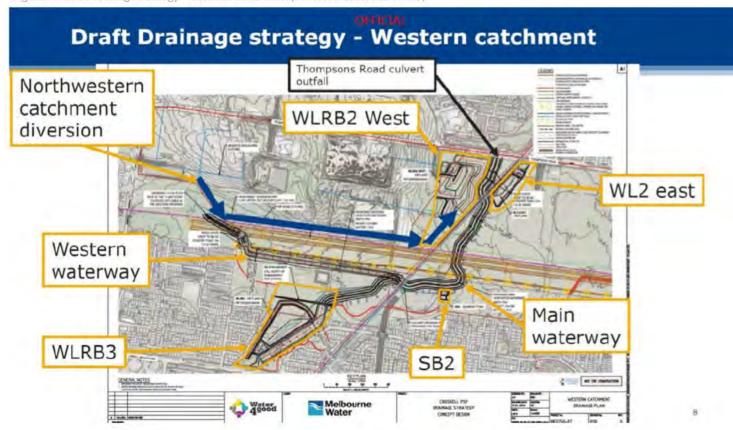


Melbourne Water Draft DSS

This submission refers specifically to the north-western catchment diversion proposed. The north-western catchment specifically refers to properties 1450 Thompsons Road and 350 Narre Warren Road. Originally, it was proposed that these properties would have their own retarding basin to restrict flow to pre-development levels and discharge to the south under the powerline easement into a channel. However, the scheme has been amended to remove this basin and combine it with WLRB2 to the east. Accordingly, developed flow will now need to be conveyed from the low point of 350 Narre Warren Road east along the northern side of the powerline easement through 1500 and 1520 Thompsons Road to the wetland.

While it is acknowledged it is more efficient to combine the two basins, this proposal will have far greater adverse impacts on the development of properties in the north western precinct that will outweigh this benefit.

Figure 11: Draft Drainage Strategy – Western Catchment (Source: Melbourne Water)



Extent of Earthworks

It is proposed by Melbourne Water that a local road be used to convey gap flows in the major storm event from the north-western catchment east to WLRB2. However, the topography of the land, in particular a high north-south ridge along the alignment would require an enormous quantity of earthworks to achieve this. Beveridge Williams have performed modelling to assess the scope of these earthworks.

The following assumptions were adopted:

- Saw-toothing could not be adopted for the road as DTP standards could not be met for this magnitude of flow. As such, minimum road grade would be 1in200.
- Being proposed for industrial development, large flat pads are required for building construction, and lots
 must be close to road level for heavy vehicle access. Market research has nominated a likely depth of lots at
 80m for these developments. As such, a corridor of 80m adjacent the roads has also been considered to
 include the full effect of this road grading on the wholistic development.
- If the northern match in then ends up in a large amount of fill, it also considers the distance of filling required through the property so as to grade back to existing levels that would not have previously been required.
- 300mm freeboard would be required according to Melbourne Water standards for this alignment. With the
 road at full capacity, this means even on the low side of the road, lots would need to be filled to 300mm
 above road level to meet freeboard.

To review all possibilities four options have been considered:

- Option 1: A base case following the existing topography for comparison. This would fit the original proposal for a basin in 350 Narre Warren Road. Follows the preferred alignment to maximise development potential having a row of lots south of the road fronting the easement.
- Option 2: This option utilises the same road alignment as option 1, but now grades the road to the east to convey gap flows as per the revised Melbourne Water proposal.
- Option 3: Also grades to the east to convey gap flows, but now runs along immediately adjacent to the easement.
- Option 4: Reviews if the flow path could be moved to the north of the site, or, act as a secondary path to split
 flows

Concept plans for the proposed grading of each option has been included in Appendix B. While quantities and indicative cost estimates have been included below. As shown, requiring this road to convey gap flows would incur a prohibitive additional cost to the developers.

Table 1: Indicative quantities and cost estimates of earthworks (Source: Beveridge Williams)

	Rate	Option 1		Option 2		Option 3		Option 4	
		Quantity	Cost	Quantity	Cost	Quantity	Cost	Quantity	Cost
Cut	\$10	170,000	\$1,700,000	410,000	\$4,100,000	100,000	\$1,000,000	2,300,000	\$23,000,000
Fill	\$10	110,000	\$1,100,000	560,000	\$5,600,000	800,000	\$8,000,000	400,000	\$4,000,000
Import	\$10	0	\$0	150,000	\$1,500,000	700,000	\$7,000,000	0	\$0
Total		\$2,800,000		\$11,200,000		\$16,000,000		\$27,000,000	
Extra Cost		\$0		\$8,400,000		\$13,200,000		\$24,200,000	

Level Differences

In addition to earthworks, the level difference created by these proposed level differences will create further costs, and functional issues. While the site is steep in terms of industrial development, Option 1 managed to create manageable interfaces within the development and its existing constraints. Option 2 and 3 create as much as a 5m level difference at the western end of the road between the proposed local road above Narre Warren Road and the Easement. This level difference is not manageable and the extent of work that is required in close proximity to the VDP cable creates a risk. These options also simultaneously push the road lower through the hill, lowering the road adjacent the proposed development to the point it will not be feasible to match the lots to the road as they fall will be too steep.

Capacity of Local Road to Convey Flows

2.7cu.m/s of gap flow is sent south in the diversion. However, as shown below, even at full capacity and 1in200 grade, a quick calculation would show the road to only have around 2cu.m/s of capacity. Critically, the local road is not continuous, and separated by open space proposed adjacent the easement. Levels will not allow deviation around the park and council will not allow flow path through the park.

Figure 12: Capacity of Local Road to Convey Flows (Source: Beveridge Williams)



Sequencing of Works

The proposed option also restricts the sequencing of works within the PSP. Where the western sub-catchments previously had their own outlet, they are now reliant on a multitude of properties to construct significant downstream infrastructure to allow them to develop. Namely WLRB2, as well as pipeline and gap flow path through 1500 and 1520 Thompsons Road. This is a poor outcome as it will unnecessarily restrict their development or require extensive temporary works.

Protection of William Thwaites Boulevard

Being a major thoroughfare, it is believed that William Thwaites Boulevard will require protection from gap flows. Significant additional capture pits and 1% AEP pipes will be required to capture and convey the flows under the road. Capturing such a significant flow in roadside pits attracts a risk and presents many challenges. Creating such a situation should be avoided where possible.

1% AEP Pipe Option

An alternative to the road conveying gap flow, could be to pipe the 1% AEP, which we understand would be in the order of 11-12cu.m/s total. A schematic of this pipe shows it would require 4xDN1500s at 1in500 grade. The pipeline would need to cut through the hill and would reach depths of up to 9m. For this length and depth, we believe the cost would at least be in the order of \$10M. But particularly where the pipe is up to 9m deep poor ground conditions and extensive groundwater issues could be uncovered creating the risk the cost could balloon. As such, Beveridge Williams also believe such a pipe is a poor outcome. For reference, a section of this pipe has been included in the Option 1 concept.

Summary

In summary, reviewing the issues presented here, Wagstaff submit that the DSS proposal to divert the western subcatchment to the east will provide a poor outcome, restricting development potential and placing unreasonable costs onto the developers. The key issues with the proposal include:

- Unrealistic earthworks quantities
- Unmanageable level differences
- Restrictions on the sequencing of development
- Protection of major roadways.
- The open space adjacent the electrical easement would obstruct the flow path.

We believe Melbourne Water now has a responsibility to review their proposal and strive to provide an alternative which can practically be developed and work to provide maximise the development potential of the PSP.



Staging of Precinct Development and Delivery of Infrastructure

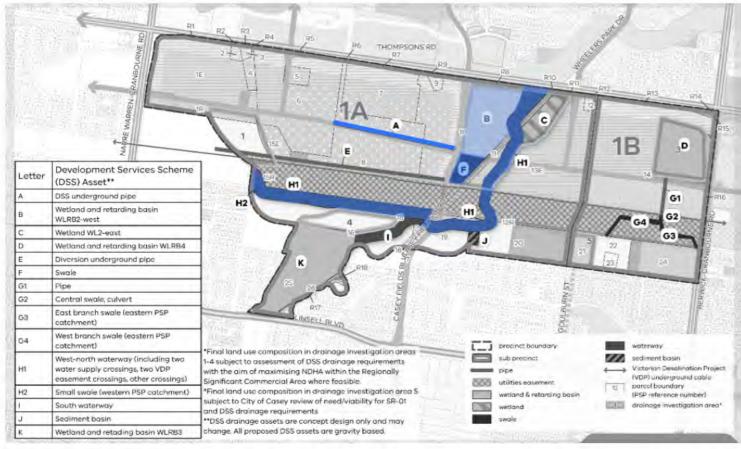
DSS Asset Construction

Section 3.6 of the draft PSP and particularly section 3.6.2 is problematic to the development of the PSP. The DSS Asset reference identified in Table 19 must be delivered prior to SOC for a single stage within the sub-precinct. This means that prior to 1500 Thompsons Road achieving SOC for Stage 1 of their development for example, the following DSS works will need to be completed:

- DSS Asset A DSS Underground Pipe
- DSS Asset B Wetland and Retarding Basin WLRB2
- DSS Asset F Swale
- DSS Asset H1 West-north waterway (including two water supply crossings, two VDP easement crossings, other crossings

The delivery of this downstream infrastructure is dependent on 9 other landholders, and includes a complex desalination powerline crossing.

Figure 13: Infrastructure and Development Staging (Source: VPA, draft PSP Plan 11)



It is further noted that the wording of R36 which mandates the above requirements does include the statement 'must be delivered unless otherwise agreed in writing by the responsible authority and Melbourne Water'. This does not provide any certainty of confidence to developers.

The staging plan as currently drafted is reliant on development of downstream properties developing the necessary drainage infrastructure, which will impact on the timely delivery of other infrastructure upstream such as key precinct access (including in the Wagstaff land).

Wagstaff submits that it is important to allow for temporary / interim solutions to manage drainage, given that the staging and delivery proposed by the draft DSS. Whilst Wagstaff supports the apparent flexibility proposed in R36, it is submitted that the draft PSP lacks clarity regarding the circumstances in which an alternative or temporary solution would be agreed.

It is also noted that the staging plan prioritises the development of residential land in the south of the precinct whereby properties #15, #16,#18, #19, #20 are required to provide drainage assets prior to development of the proposed commercial and industrial land in the north west of the precinct.

Given that this is a regionally significant commercial precinct, it is submitted that the delivery of commercial land should be prioritised through any staging plan. Restrictive staging of the precinct should not be applied, enabling the bringing forward of key infrastructure in strategic locations for the benefit of the wider precinct, and enabling larger landholdings with the capacity to undertake works in kind to proceed early in the development of the precinct.



Issued: 31/10/2023

Contact:

Vegetation

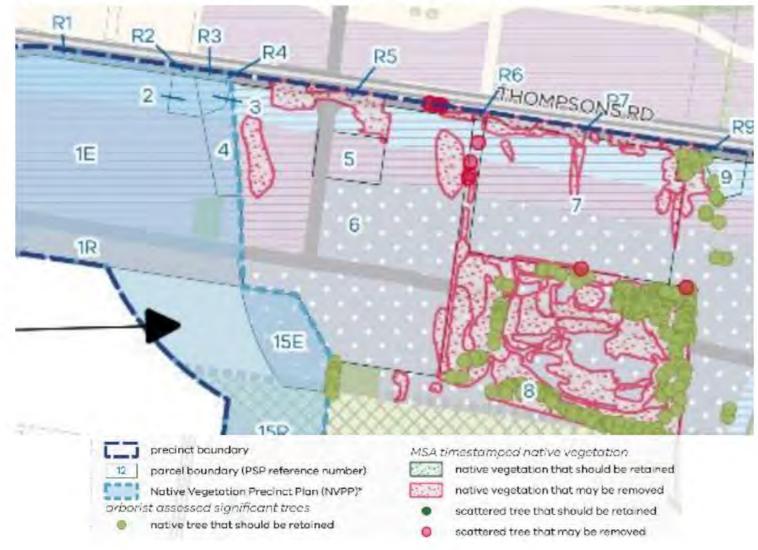
The draft PSP R21 requires that removal and retention of native vegetation be in accordance with the Plan 8 Native vegetation retention and removal. Plan 8 shows vegetation within the site as to be removed. The amendment also proposes to amend the Schedule to Clause 52.17 Native Vegetation to include native vegetation removal exemptions for Melbourne Strategic Assessment (MSA) areas within the PSP. The subject land is noted as being within the MSA area.

The draft PSP requires that any application to subdivide land, or to construct a building or construct and carry out works on the site must be accompanied by an arboricultural report identifying all trees on the site and a tree retention plan identifying how the application responds to tree protection requirements and guidelines within the incorporated Croskell (Employment) Precinct Structure Plan. It is noted that there are no specific tree protection requirements or guidelines other than a guideline that arborist assessed trees that are identified as 'should be retained' should be so unless otherwise agreed by Council.

Based on initial analysis it is unlikely that trees will be able to be retained given the cut and fill requirements across the site, future road and infrastructure connections, and the likely open space strategy (whereby there is no need for open space in this location given the extensive open space provided through Croskell by the easement land, drainage land, and existing Council reserves). The removal of the vegetation is likely to be required to facilitate orderly and efficient development in the precinct. Further, these trees have already been calculated as lost through the Melbourne Strategic Assessment (MSA), where the landowners will be liable for a levy to offset their loss regardless of whether they are retained. It is poor policy to require the retention of vegetation that is already considered lost by the MSA.

Notwithstanding, it is noted that flexibility is provided in G20 for Council to consider tree retention and Wagstaff support the flexibility that G20 provides.

Figure 14: Native Vegetation Retention and Removal Plan (Source: VPA, Extract from Croskell PSP Plan 8)



Other Matters for Consideration

Open Space

It is noted that the PSP proposes 39.82% of the PSP as open space. Considering the directions and recommendations noted under the VPAs Precinct Structure Planning Guidelines 2 New Communities in Victoria (Oct 2021) and specifically, how they relate and apply to employment land, we question how open space provision has been categorised within the PSP. Notably, key observations identify the following:

- 'The open space network should seek to meet the following minimum targets: Within dedicated employment and or / economic activity areas, 2% of the net developable area for local parks'. (page 74)
- Further, the Guidelines identify 'opportunities to utilise existing open space (for example, existing sports reserves within the catchment) and encumbered land to be set aside for natural systems (for example, conservation, waterways) landscape values or utilities easements'. (page 74).
- Page 76, Section F11.4 of the Guidelines provide further direction on the use of public land used or set aside for utility or service infrastructure noting that these areas 'should be multi-functional where possible'.

Whilst not necessarily directly problematic to the development of the Wagstaff land, Plan 7 identifies credited and uncredited open space across the PSP. The extent of open space to be delivered in this PSP is considered excessive, and ultimately impacts the ICP rates.

Groundwater Licences

Requirement R33 on page 30 of the draft PSP requires further clarification. R33 requires: Prior to the construction of any drainage assets shown within the relevant Development Services Scheme, the proponent must obtain any relevant groundwater licenses and/or approvals from the relevant authority. Given the challenges developers are encountering within the Botanic Ridge PSP between Southern Rural Water and Melbourne Water with regard to the construction of drainage assets and implications on groundwater, it is submitted that licenses may not be so easy to achieve and R33 may require further consideration.

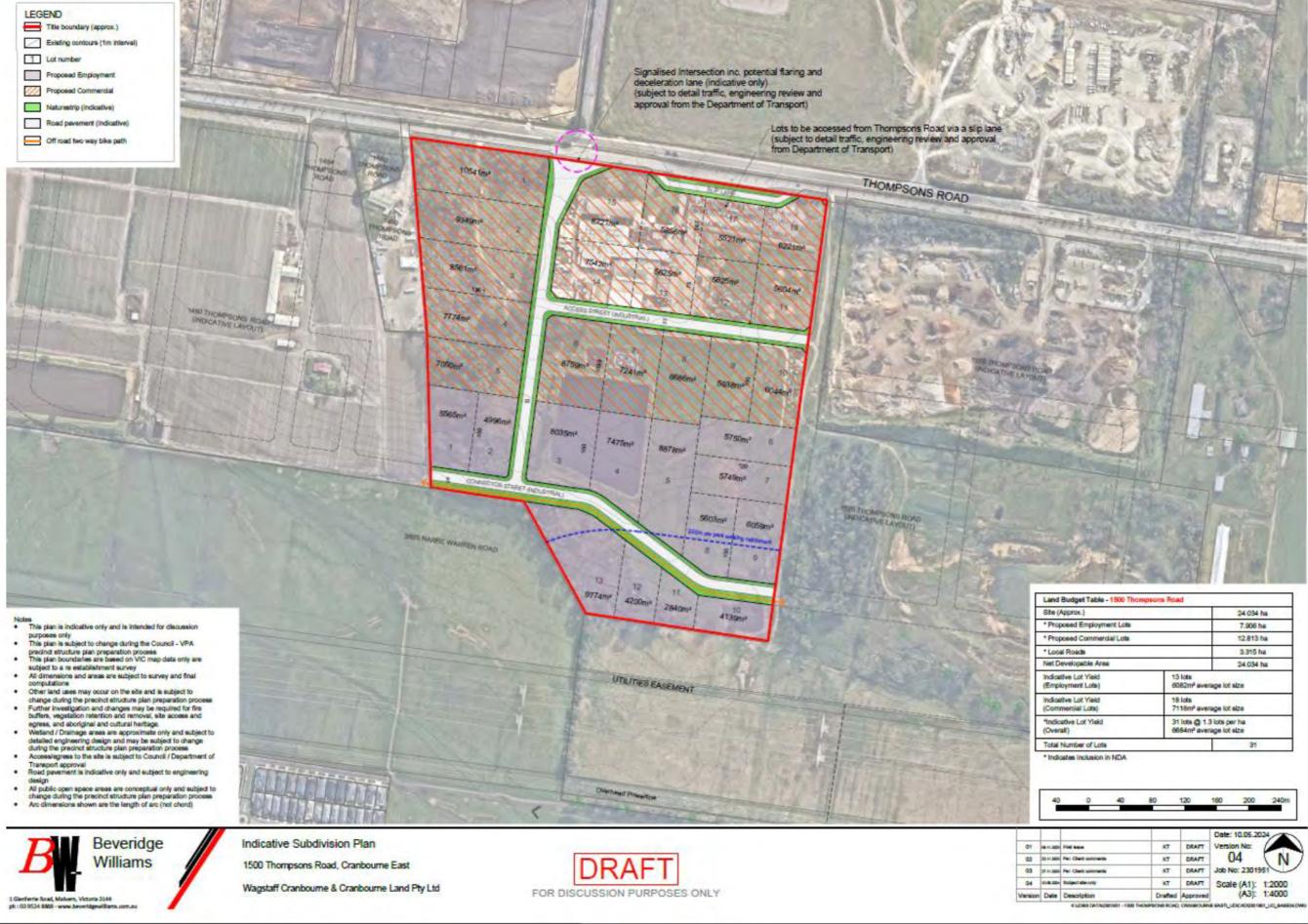
Built Form & Setbacks

It is submitted that the requirement to set upper floor levels back to manage visual bulk along the Thompsons Road frontage as specified in R17 is unnecessary and an inefficient use of land. Thompsons Road does not have a residential or sensitive interface and there is no need to reduce visual bulk to this road. Noting that buildings along this frontage would be north facing, there is no logical reason to set upper stories back in this location.

It is also noted that there is a requirement in R17 that car parking be located to the side or rear of the site. This is limiting and should be a noted as a guideline only. There are multiple examples of industrial development where car parking is located to the front of the building and good design outcomes have been achieved. This also assists in separating visitor and loading/working operations on the site (i.e. improves site safety). The need for those off-street car parking areas to connect to the primary entrances of buildings with pedestrian paths also has the ability to have entrances designed to the side of buildings so as buildings are better integrated with the street.

Reference: 2301951

Appendix A: Wagstaff Indicative Concept Plan



Version: 1

Reference: 2301951



Appendix B: Wagstaff Abattoir Separation Distance Assessment (GHD)