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9 October 2024

Mr. Stuart Moseley
Victorian Planning Authority
RE: Croskell (Employment)
Level 25, 35 Collins Street
MELBOURNE VIC 3000

By email: croskellemployment@vpa.vic.gov.au

Dear Stuart,

MAB Submission to Amendment C296 to the Casey Planning - Croskell Precinct Structure Plan

MAB is pleased to provide the attached submission to the Victorian Planning Authority (VPA) in relation to Amendment C296 to the Casey Planning Scheme (the Amendment).

MAB requests further discussion with the VPA and Melbourne Water to work through the submissions and reach an agreed position prior to the Standing Advisory Committee (SAC) hearing.

We look forward to continuing our collaborative and positive approach to progressing the Croskell PSP. MAB requests discussions with the VPA and Melbourne Water to agree on responses to all or specific parts of our submission prior to the proposed Directions Hearing.

MAB is completing a technical review in response to specific components of the Amendment and supporting documents, including:

- Melbourne Water and Water 4 Good Drainage Services Scheme reports;
- Geografia's Commercial and Industrial Land Needs Assessment regarding land use allocation;
- Arborist assessment of existing vegetation; and
- Infrastructure Contributions Plan (ICP) costs for items required to be delivered by MAB.

Given the above, MAB reserves its right to make further submissions prior to and during the Standing Advisory Committee process.

Should you require further information or have any queries, please contact myself on [REDACTED].

Yours sincerely,

Director, Planning

CC: croskelldrainingstrategy@melbournewater.com.au

// Submission to Amendment C296 – Croskell (Employment) Precinct Structure Plan MAB Submission

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1. Executive summary

1.1 MAB's Submission

MAB Property Developments Pty Ltd (**MAB**) is pleased to provide this submission to the Victorian Planning Authority (**VPA**) in relation to Amendment C296 to the Casey Planning Scheme (**the Amendment**).

The submission comprises four (4) components as outlined below.

Submission A – Drainage

MAB requests that the VPA adopt MAB's alternative Development Services Scheme (**MAB DSS**) which:

- Enables more land for industrial development;
- Reduces the costs of the overall DSS including land acquisition and construction cost;
- Supports the early development of each sub-catchment;
- Maximises the use of the current land encumbered by the Urban Floodway Zone (**UFZ**) and Land Subject to Inundation Overlay (**LSIO**) within the PSP for drainage purposes; and
- Builds on extensive investigation by its project team, collaboration with and feedback from Melbourne Water Corporation (**MWC**).

Submission B – Land Use

MAB requests the removal of the designation of “commercial/office and business uses” on the MAB Property and replace with “industrial” to provide much needed opportunities for small to medium industrial enterprises in the City of Casey. In MAB's experience, this designation will lead to a diverse range of industries seeking to invest in the municipality.

Submission C – Key PSP changes

MAB requests a range of PSP plan related changes.

Submissions D – PSP changes

MAB requests specific drafting changes to the PSP and its related statutory controls.

MAB requests further discussion with the VPA to work through each submission and reach an agreed position prior to the Standing Advisory Committee (**SAC**) hearing.

2. Introduction

2.1 The MAB Property

MAB owns and controls approximately 77.25 hectares of land across three individual sites (**MAB Property**) centrally located within the Croskell (Employment) Precinct Structure Plan (**PSP**) – see **Figure 1**.

Table 1 – MAB Properties

Property	Area (ha)
1550 Thompsons Road, Cranbourne East	12.18
1568 – 1580 Thompsons Road, Cranbourne East	32.61
1520 Thompsons Road, Cranbourne East	32.46
Total	77.25

The MAB Property has a 1.3-kilometre frontage to Thompsons Road (designated as a Principal Freight Route in the South-East Growth Corridor Plan). Businesses in the MAB Property will benefit from direct access to Casey Fields Boulevard – a future key transport route planned by the City of Casey to connect from the South Gippsland Highway in the south to Thompsons Road via a future signalised intersection. Access and exposure are key drivers of success for employment precincts and these transport connections will support development of high-quality industrial uses generating employment opportunities for the local and state economy. Businesses in the MAB Property will be well buffered from existing residential developments, relative to other properties in the PSP, including being an adjacent to the Cranbourne North Service Business Precinct to the north, making the MAB Property an ideal location for industry uses.

Figure 1 – MAB Property



MAB has demonstrated experience in delivering large-scale employment developments in Melbourne's growth areas, including Element Park and Thompsons Base in the City of Casey, Merrifield Business Park, Northcorp Industry Park, National Business Park, Translink Business Park and Global Business Park in the City of Hume, University Hill in the City of Whittlesea and the future Greater Avalon employment precinct in the City of Greater Geelong.

These projects have importantly delivered a breadth of high-quality employment uses meeting immediate and long-term needs of businesses and generated thousands of new jobs. The success of these developments has been underpinned by planning controls that allow a high degree of flexibility with the capability of responding to changing market, societal demands and ever evolving industries including warehousing, transport and logistics, manufacturing, digital infrastructure and many others.

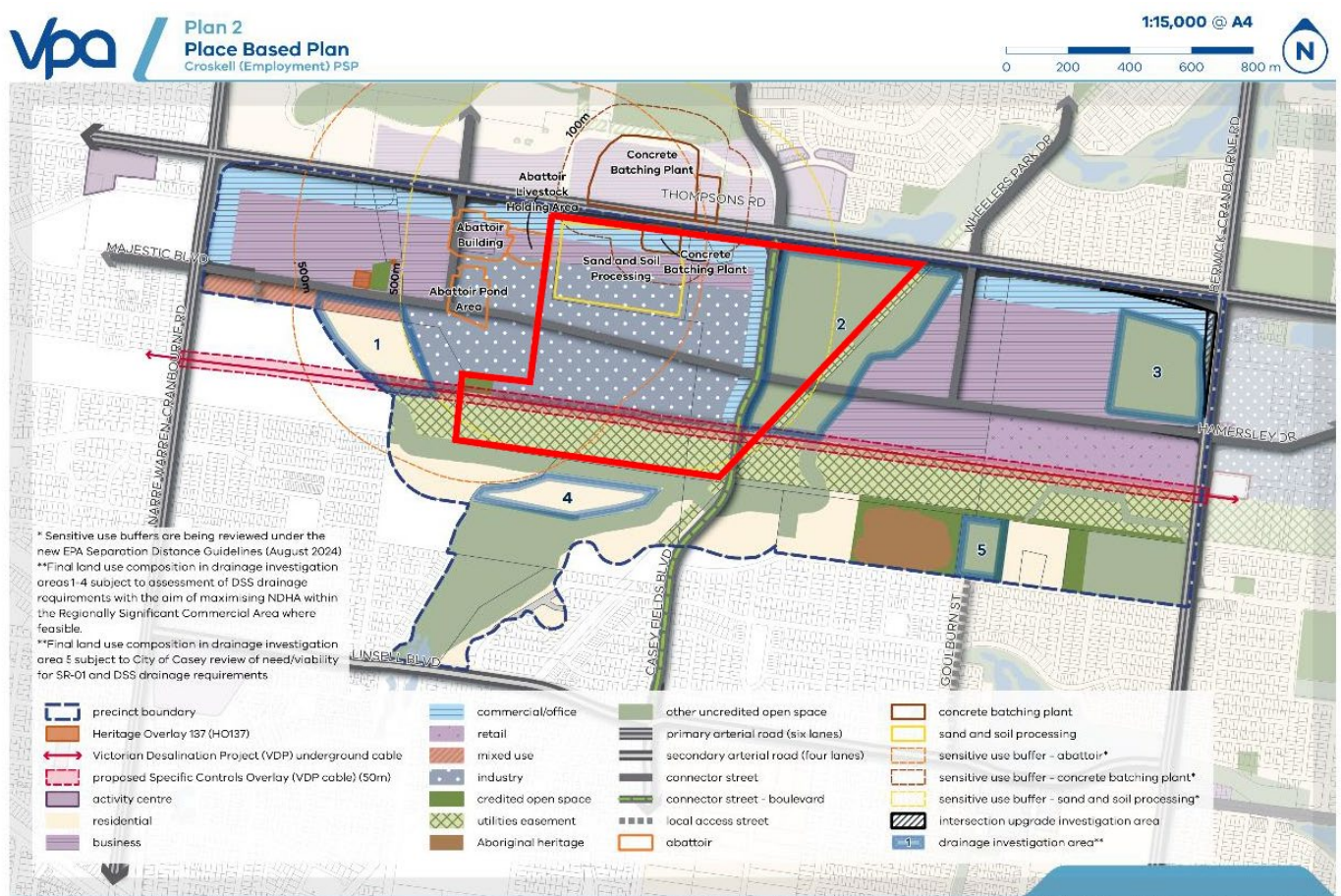
3. Submission A – Drainage

3.1 Drainage Investigation Area – 2

MAB acknowledges the extensive work undertaken by the VPA and MWC to balance planning and drainage objectives for the PSP to enable the development of a high-quality employment precinct.

Drainage Investigation Area 2 is shown on the MAB Property in the Draft Place Based Plan in **Figure 2** below. MAB has significant concerns with Drainage Investigation Area 2 as it is currently shown as it encumbers an additional 9 hectares (approximately) of strategic land fronting Thompsons Road and Casey Fields Boulevard that has the potential to support high-quality industrial uses. Importantly, this additional area identified for drainage is located outside of the existing Urban Floodway Zone (UFZ) and the Land Subject to Inundation Overlay (LSIO) as shown in **Figure 4**.

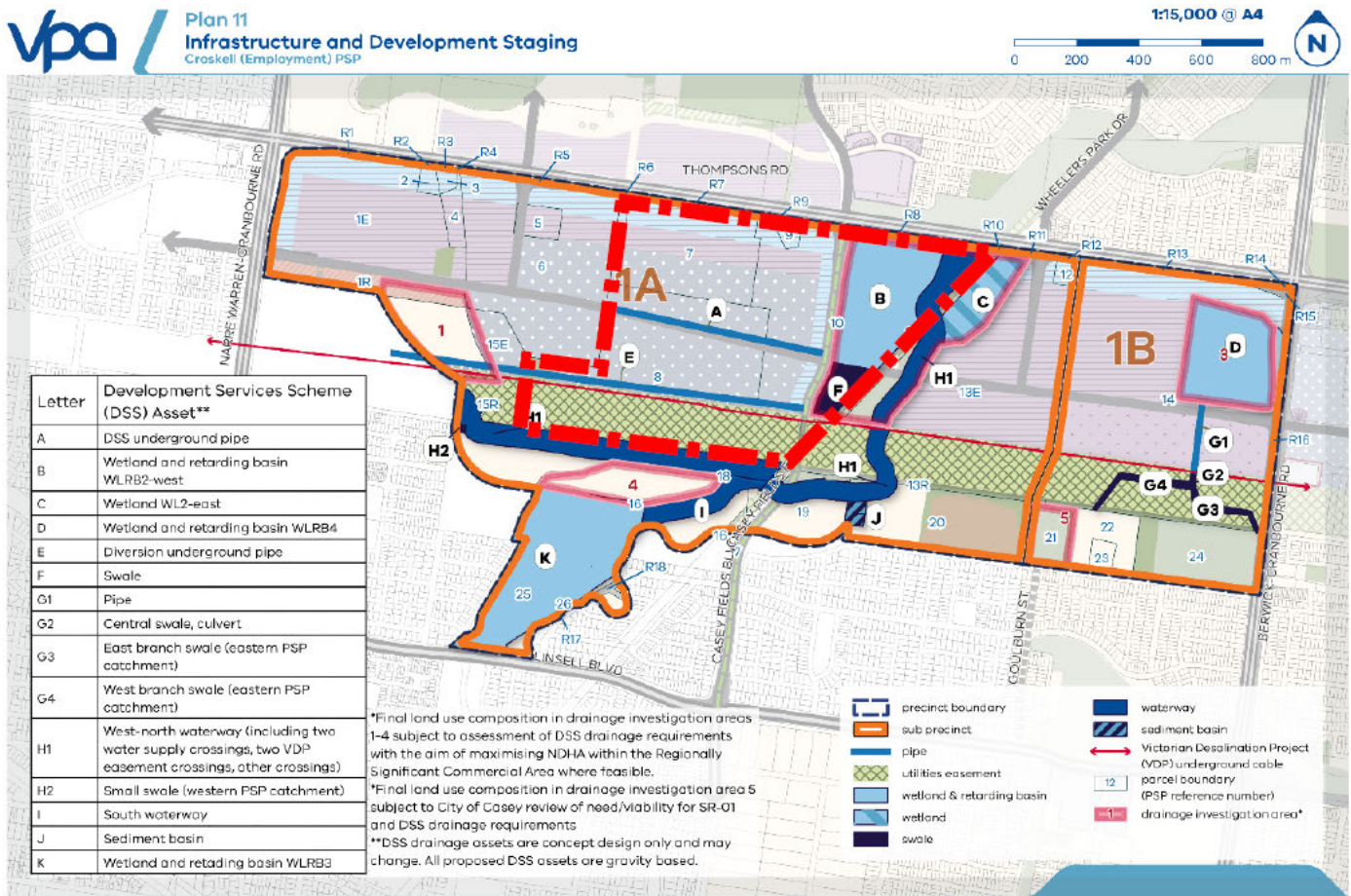
Figure 2 – Draft PSP Place Based Plan



Section 3 and Plan 11 (Infrastructure and Development Staging) of the Draft PSP shown in **Figure 3** identifies the following proposed Development Services Scheme (**PSP DSS**) assets on the MAB Property:

- A: DSS underground pipes;
- B: Wetland and retarding basin WLRB2 - West;
- F: Swale; and
- E: Diversion underground pipe.

Figure 3 – Draft PSP Infrastructure and Development Staging



3.2 MAB's Alternative Drainage Services Scheme (MAB DSS)

Drainage Investigation Area 2 as currently shown in the draft PSP severely impacts the opportunity to deliver a functional development suitable for industry on the MAB Property. Following recent discussions during the consultation period with the VPA and MWC, MAB is of the view that the proposed PSP DSS:

- Underutilises the existing UFZ/LSIO land on the Property which is inconsistent with one of Melbourne Water's own objectives to utilise encumbered land for drainage purposes – reducing the availability of much needed land for industrial development;
- Severely compromises urban design outcomes associated with the Thompsons Road and Casey Fields Boulevard interfaces, which would be dominated by drainage infrastructure, limiting active employment uses;
- Creates an unnecessarily expensive DSS which would significantly impact the timely activation of the PSP;
- The cost of the proposed DSS would be unnecessarily higher;
- Impacts the proposed east-west connector street required to connect Berwick-Cranbourne and Narre Warren-Cranbourne Roads by splitting the proposed WLRB2 – West (B) and the Swale (F), compromising the function of these drainage assets;
- Leads to a reduction in the PSP's overall employment land and increases the Infrastructure Contribution Plan (ICP) supplementary levy; and
- Creates a development timing constraint for Stage 1A (western portion of the PSP) as shown in **Figure 3** due to reliance on drainage infrastructure in the MAB Property to service neighbouring sites.

The City of Casey has advised MAB they support maximising employment outcomes for the PSP, in particular the gateway opportunity at the Thompsons Road and Casey Field Boulevard intersection. The City of Casey is seeking to collaboratively resolve drainage matters prior to the SAC hearing with key developer proponents in early 2025.

MAB has prepared an alternative DSS (**MAB DSS**) which addresses MAB's fundamental concerns with the current DSS incorporated within the PSP documentation Plan 11.

MAB has focussed on ensuring that the DSS ultimately:

- Optimises the Wetland and retarding basin WLRB2 -West on the MAB Property to remove the additional 9 hectares of unnecessary drainage infrastructure outside of the UFZ and LSIO areas;
- Reinstates a sediment basin in the western portion of the PSP (Drainage Investigation Area 1 identified on Plan 2) to control the flow of drainage run off into the proposed diversion pipe shown as item E in Plan 11. This sediment basin is required for the optimal functioning of the diversion pipe and to enable the early release of developable land in western portion of Stage 1A in **Figure 3**; and
- Avoids any additional waterway crossing of the desalination cable and effectively controls water treatment in locations throughout the PSP.

The three key elements of the MAB DSS are highlighted below. A technical memo prepared by Verve is attached to this submission and incorporates feedback from MWC during the consultation period.

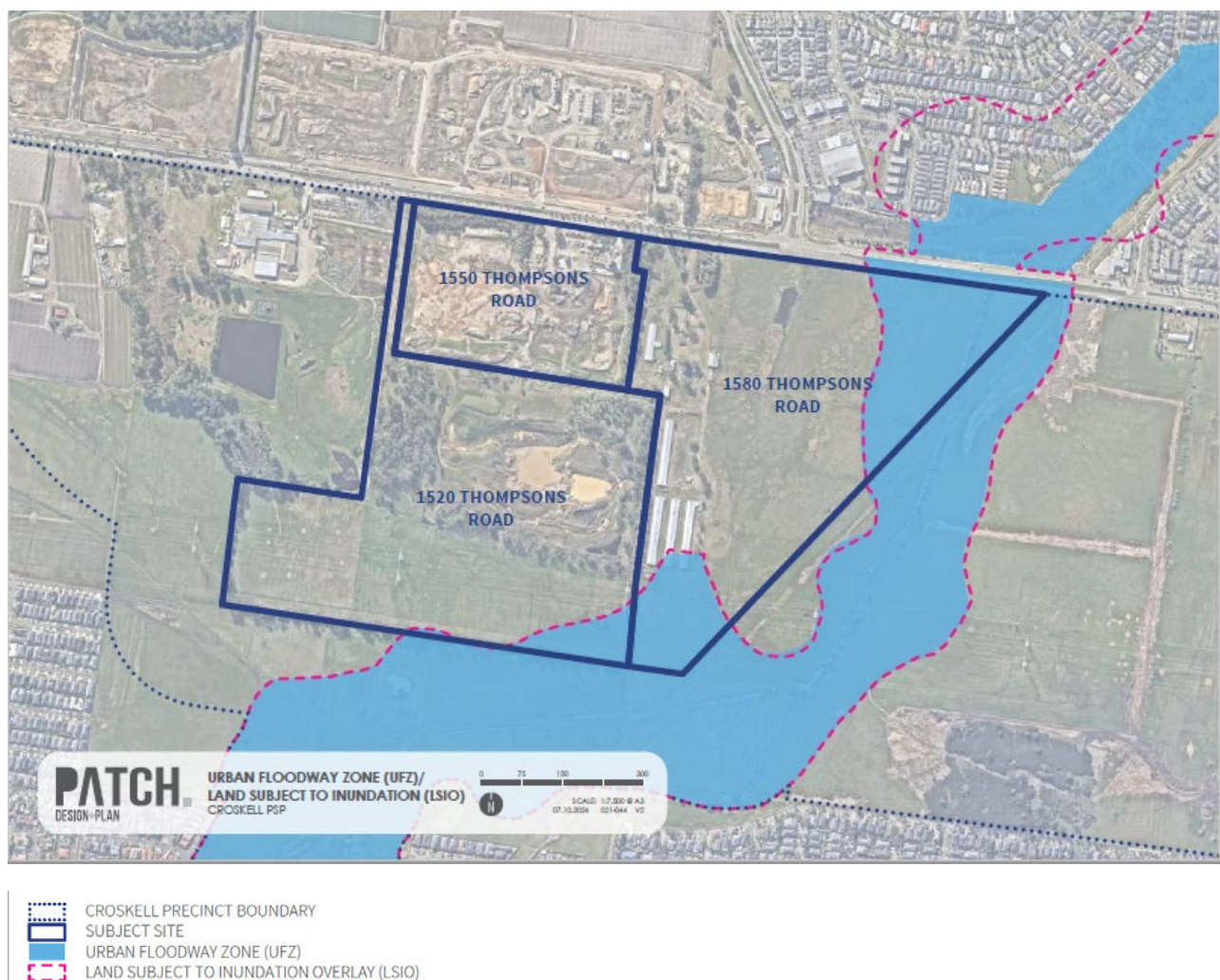
3.2.1 Reduce the size of WLRB2 – West

WLRB2 - West is contained within Drainage Investigation Area 2 and is currently larger than what is required to manage drainage in the PSP. As a result of this increased drainage area, MAB's ability to deliver a vibrant and functional industrial precinct is compromised due to the loss of strategically located employment land fronting Thompsons Road and Casey Fields Boulevard being the primary north-south connector of the PSP and the gateway into the PSP.

Figure 4 below shows the extent of UGZ/LSIO land within the MAB Property in light blue.

Preliminary technical background work prepared by MWC and their hydraulic consultant Water for Good (**W4G**) in October 2022 supported an option for a DSS layout that confined drainage assets within the UGZ/LSIO extent – minimising impacts on unencumbered land.

Figure 4 – Extent of UGZ/LSIO on MAB Property



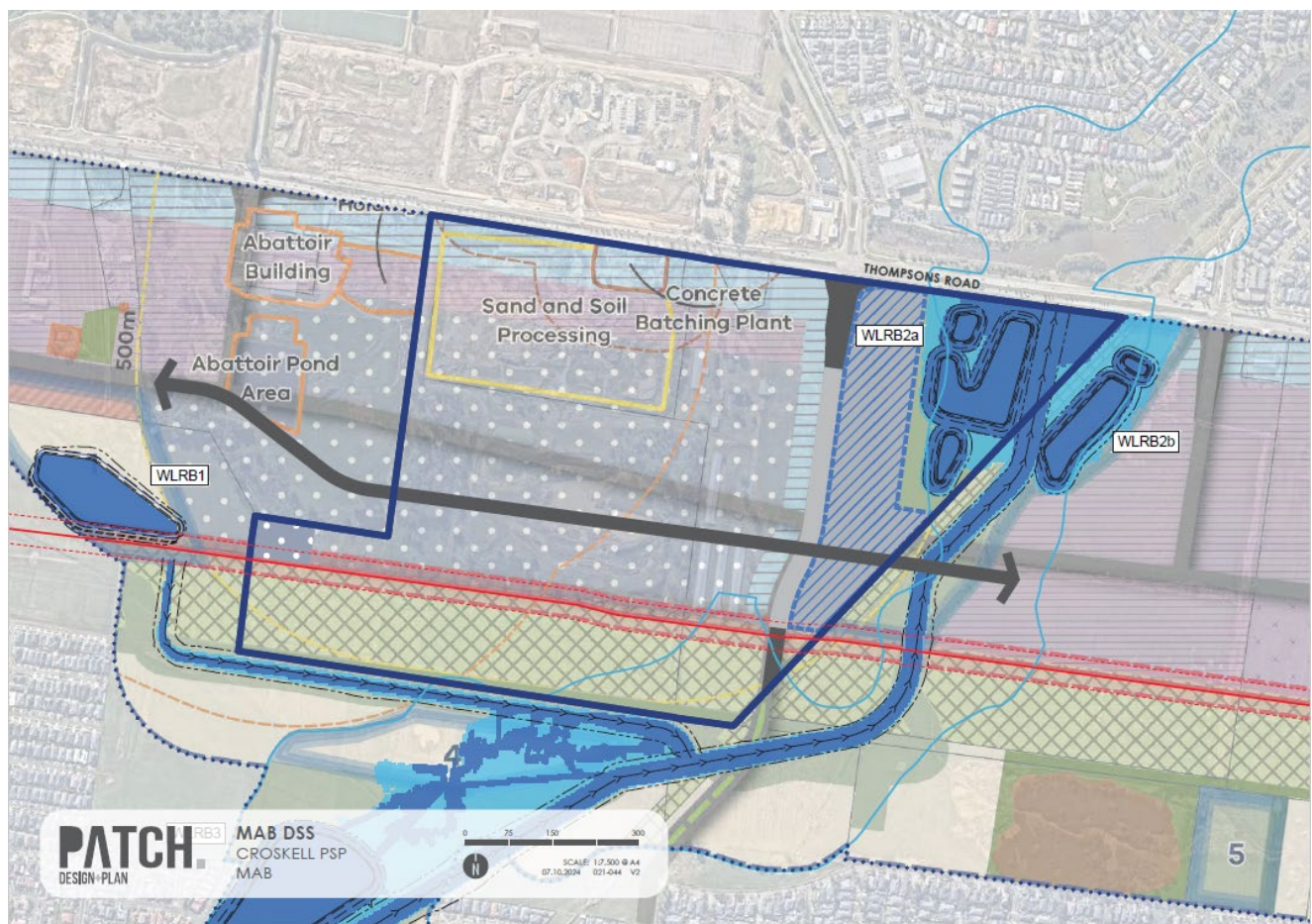
MAB's DSS investigation confirms that the size of WLRB2 - West can be accommodated within the footprint of the existing UGZ/LSIO as:

- There is a high-flow bypass contained within the reserve which is redundant given the waterway is immediately adjacent to the wetland;
- The proposed sediment drying areas are located on high value land in the PSP and could be relocated to a landlocked area on the east side of the waterway;
- An engineered solution would enable dry weather access to this sediment drying area utilising the proposed shared use path along the south side of Thompsons Road; and
- If the channel shaped area is not needed for water quality, it should be removed.

Figure 5 below provides a conceptual interpretation of MAB's DSS design of WLRB2 - west which shows a revised layout overlaid on Plan 2 of the PSP.

This was presented to MWC on 30 September 2024 and MAB received confirmation on 4 October of MWC's support for the layout in MAB's DSS, subject to meeting current MWC design standards and managing site constraints. Further discussions are required prior to the SAC hearing to refine the MAB DSS proposed design; however, the layout demonstrates how WLRB2 - West can be designed to be contained wholly within the UFZ on MAB's Property resulting in a materially less expensive overall DSS and meeting the demand for employment land in a key location.

Figure 5 – MAB proposed revised WLRB2 – West Design



3.2.2 Diversion underground pipe (E)

The east-west diversion pipeline should be sized appropriately to accommodate the Q100 flows to remove the need for the Local access Street as shown on **Plan 4** (Movement Network and Public Transport.) on the draft PSP.

MAB has taken advice that confirms that this pipe is suitable to convey the Q100 flows from the western catchment of the PSP, without the need for any retardation within an access street whilst avoiding gap flows crossing over the VDP cable.

Importantly, existing site levels will result in extensive earth works to enable its construction and to achieve the overland flow paths required as any road adjacent to the easement would need to be offset from the transmission easement by more than 20 metres. This results in a substantial loss of developable property (>2 hectares) as well as significant civil works to avoid extensive, tall retaining walls near the electricity easement.

The PSP should be amended to allow flexibility for the location of the diversion pipe within a suitable road, public space or easement within lots to the satisfaction of MWC. The location of the pipe should be determined at the Planning Permit Stage.

3.2.3 Reinstate WLRB1 on Property 15 - Drainage Investigation Area 1

MWC and W4G previously identified a wetland located in Drainage Investigation Area 1 however it was removed as part of MWC's final draft DSS that informed the PSP. MAB is pleased that MWC has agreed to further consider the reinstatement of WLRB1.

Importantly, WLRB1 would provide water quality treatment and assist with the timely staging of development in the western catchment without the need for temporary drainage to be provided for an extended period.

The reinstatement of WLRB1 of approximately 2 hectares (subject to further detail) would:

- Enable early development of land within the western catchment of the PSP by not having these landowners rely on the primary drainage infrastructure in MAB's Property;
- Treat and manage stormwater flows before it is channelled into the diversion underground pipe E; and
- The addition of WLRB1 would result in an overall lower PSP land area required for drainage assets across all Investigation Areas and a subsequent cheaper DSS rate payable by all landowners.

Croskell PSP
Drainage Scheme Strategy
1520 Thompson Road, Chardome East
City of Casey

WLRB1

INFORMATION
NOT FOR CONSTRUCTION

Scale: 1:1000
Date: 29/06/24

AFFLUX CONSULTING
Sustainable Land Engineering Solutions

Table 2 below provides a summary of the preliminary costs associated with the current MW DSS and MAB's DSS. The assessment undertaken by MAB's consultant reveals a major difference in the land acquisition costs and indicates that MAB's DSS would be more cost effective primarily due to:

- ### Table 2 – Preliminary DSS costs

**Indicative costs only and subject to further refinement with MAB and MWC.*

4. Submission B – Land use

4.1 Designate more land for Industry

MAB previously provided a copy of the Urbis Economic report to the VPA in its letter dated 3 March 2023. This report identifies the shortfall of appropriately located land for industry and highlights an opportunity to meet this demand on the MAB Property. The PSP should support a broad range of industry uses rather than a narrow focus on office/business use given its connections and proximity to developed industrial markets by leveraging existing infrastructure. Importantly, the PSP lacks the amenities and transport connectivity which are fundamental to the success of office-based precincts.

The PSP's location is more attuned to industry use, given its adjacency to industrial use to the west and its proximity to the industrial hub within the Dandenong National Employment and Innovation Cluster (**NEIC**) which is acknowledged as approaching capacity. This includes existing infrastructure such as the Dandenong Freight Intermodal and potential synergies arising from aligning with employment uses.

Urbis has confirmed through recent advice that given the limited supply of vacant industry land in the Southern State Significant Industrial Precinct (**SSIP**) according to the Urban Development Program 2022 data, the introduction of new land for industry would not only address land supply constraints, but also leverage the existing links that have contributed to the proliferation of industrial uses in the surrounding area.

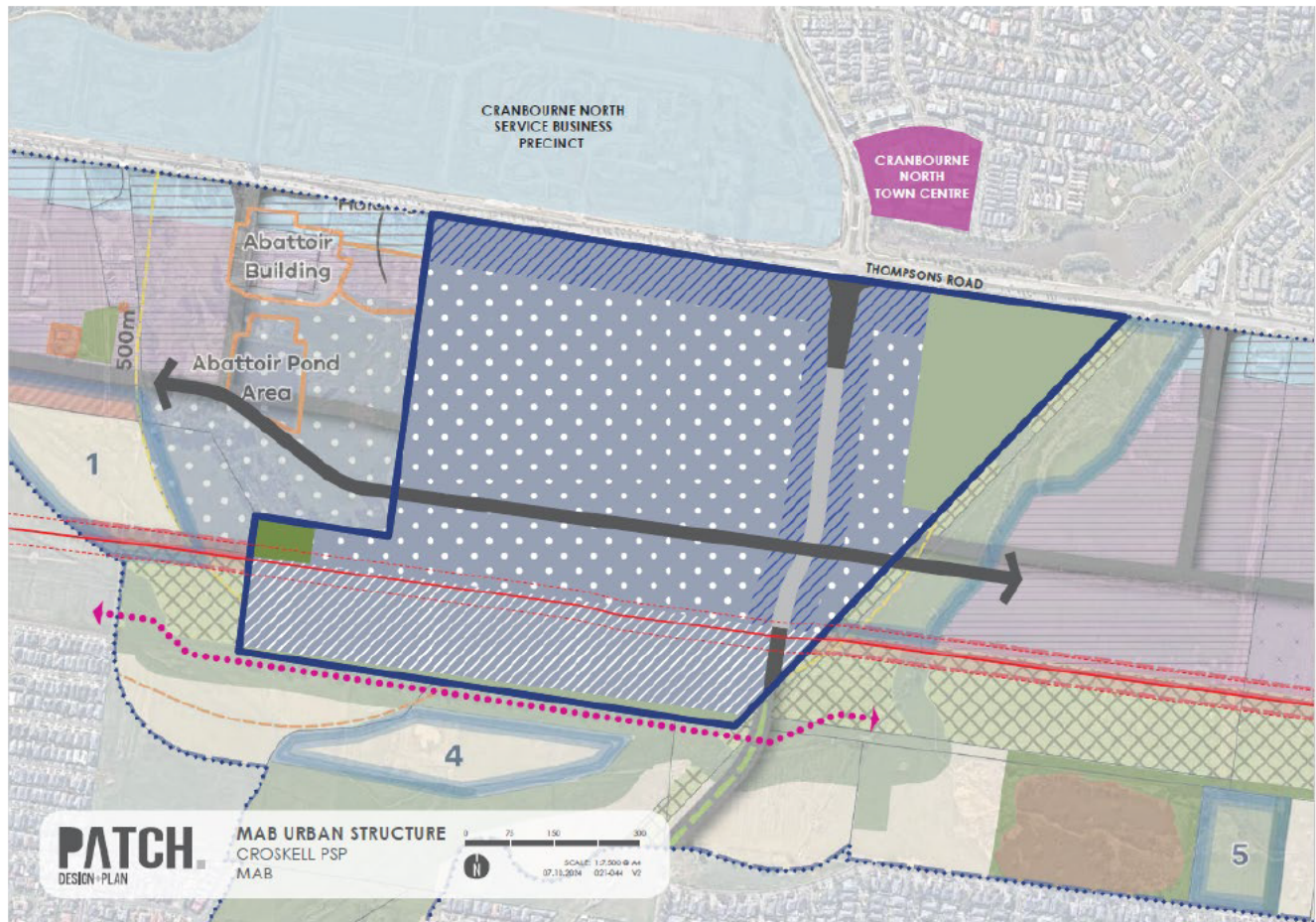
MAB understands the need for the designation of commercial services, offices and other ancillary uses through the PSP as highlighted by the Melbourne Industrial and Commercial Land Use Plan (**MICLUP**). However, this should not occur at the expense of the much-needed supply of industrial land in one of the last remaining locations in Casey - with direct frontage and access to Thompsons Road, a Principal Freight Route.

MAB requests that Plan 2 in the current PSP be amended to designate whole of the MAB Property as “Industry” and that the Commercial/Office and Business designation be removed as this approach to controlling employment land use outcomes has the potential to:

- Limit and delay the activation of key frontages along Thompsons Road and Casey Fields Boulevard in the immediate term negating the opportunity for an industrial use that may deliver a high-quality built form and urban design outcome;
- Set arbitrary development and allotment depths that would render these areas potentially inactive for an extended period given the expected low demand for commercial and offices uses in Casey outside of Activity Centres; and
- Discourage major corporate occupiers that require varying lot depths by providing uncertainty at the Planning Permit stage based on the need to locate within the commercial/office area.

Figure 7 below shows the extent of Industry proposed, with specific reference to design controls that could be applied to key interfaces.

Figure 7 – Extended Industry designation – MAB Property



4.1.1 Existing Office/Commercial supply in Casey

There are extensive areas already planned for Commercial in the City of Casey including (but not limited to):

Table 3 – Planned Office/Commercial supply in Casey

Town Centre / Employment Precinct	Commercial Floor Space (m ²) – Net Building Area	Proximity to Croskell PSP (approx.)
Casey Central Town Centre	70,000	1.5 km
Clyde Major Town Centre, Ballarto Road	50,000	5.0 km
Hardy's Road Major Town Centre	60,000	3.5 km
Minta Farm (commercial precinct)	180,000	5.0 km
Cranbourne North Business Precinct	344,000*	0.05 km
Total Commercial Net Area	704,000	-

*MAB's own analysis

Further provisions are set aside at Narre Warren-Fountain Gate, Cranbourne Town Centre, Cranbourne West Employment Area to support commercial and office uses.

This aggregated 704,000m² of current Commercial Floor Space allowance in the City of Casey is the equivalent to approximately 176 x 4,000m² commercial offices on individual allotments and associated at-grade car parking. Table 2 demonstrates that there is extensive land for extensive supply of office that would take decades to be consumed.

The *Cranbourne North Business Precinct* identified on Plan 2 in the PSP (as “Business”) on the north side of Thompsons Road is well placed to support office/commercial and business uses as envisaged by the PSP. This area is included in the Commercial 2 Zone under the Casey Planning Scheme. Despite not being identified in MICLUP or in the SEEC Report, this area should be recognised as having the potential to support future land supply for office, meeting the principles contained in MICLUP.

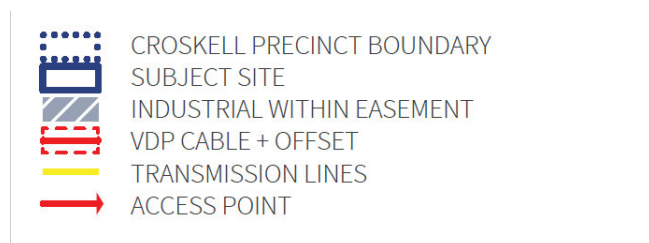
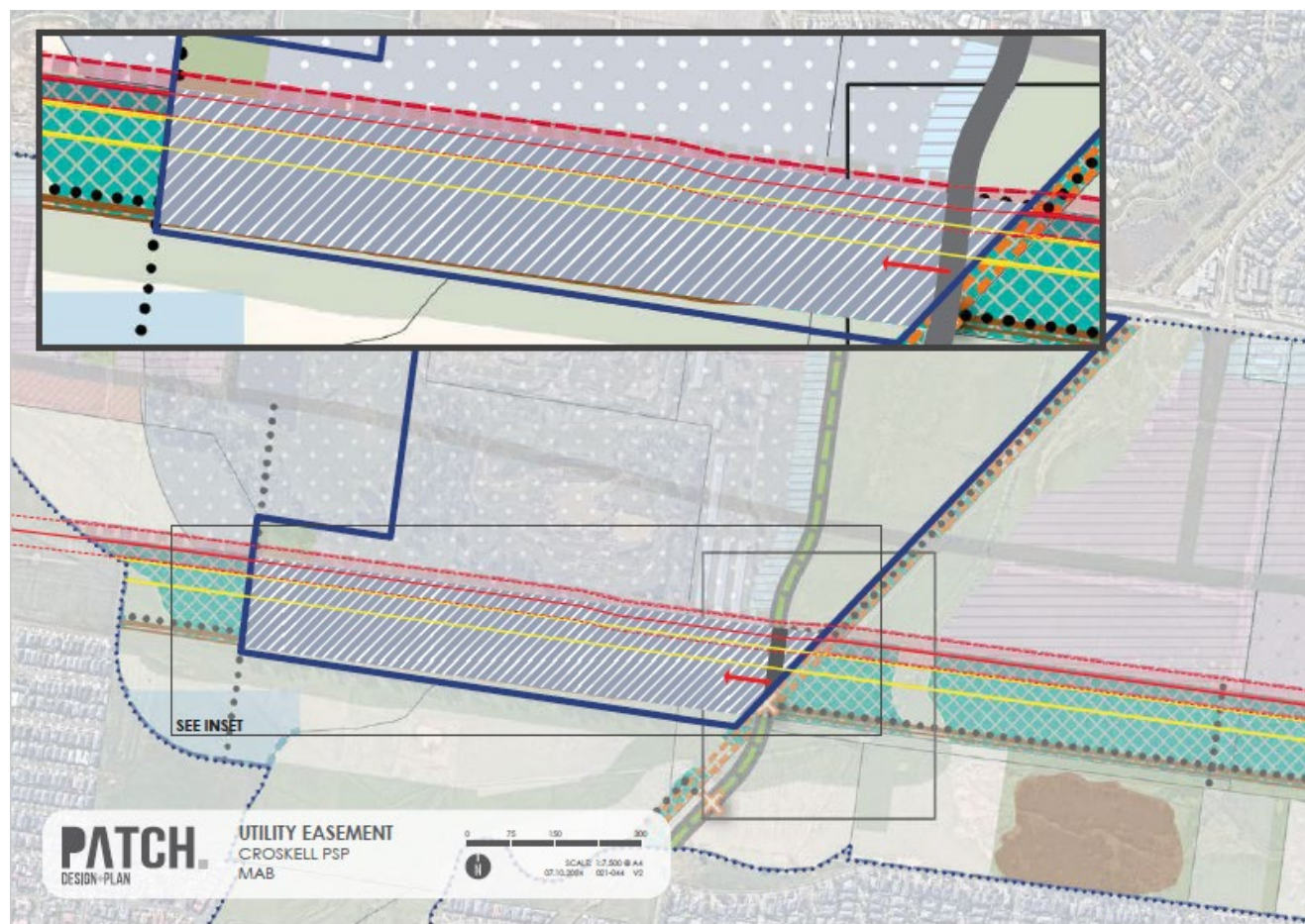
The planned role and function of, and other planned sites, must be considered in terms of its capacity to accommodate office use and the extent to which it influences the decisions regarding the need for an office and a business precinct in the PSP area. However, the priority for office take up should be the planned major centres, as this strategy will produce the greater net community benefit to the growth area over the next few decades.

4.2 Extend Industry under the High Voltage Transmission Easement

MAB requests that PSP Plan 2 (and all other relevant plans) be amended to show Industry, south of the easement on MAB’s Property outside of the VDP cable area.

Figure 8 shows that road access is available from Casey Fields Boulevard enabling the use of the Property to complement the adjacent areas. This area will support industrial uses that require large outdoor space for equipment or vehicle parking, subject to appropriate approvals. The constraints associated with AusNet’s regulation of the easement provide for a range of opportunities, provided the design and use is appropriate.

Figure 8 – Industry under High Voltage Transmission Easement



5. Submission C – Key PSP changes

5.1 Delete Plan 8 – Tree Retention

The tree retention plan included in PSP Plan 8 should be deleted, and PSP Plan 2 should be amended to show existing vegetation.

The key issues identified by MAB within PSP Plan 8 Include:

- The trees identified on Plan 8 are not identified in the Melbourne Strategic Assessment (**MSA**). The MSA provides certainty over native vegetation removal;
- The VPA's landscape assessment prepared by Spiire does not identify the trees shown for retention on PSP Plan 8 as having high retention value;
- The VPA's arborist assessment relied on aerial photo interpretation to identify indigenous trees and to then propose their retention – without a thorough on-ground assessment;
- It negates the delivery of key infrastructure, including the east-west connector street to enable activation of industrial uses as envisaged by the PSP; and
- MAB project team has confirmed that the likelihood of retention most of the majority of the trees is low given the need to accommodate challenging site levels, a future key road connection and associated DSS infrastructure in the form of diversion pipes.

5.2 Delete Plan 10 – Bushfire Plan

- PSP Plan 10 Bushfire Plan should be deleted from the PSP. The Urban Growth Zone already includes a requirement for permits to include a bushfire management plan which could be strengthened to respond to the principles contained in the Terramatrix Report which would remain as a background report to the PSP.
- The Terramatrix Report should be recognised as a background report used to inform the PSP, but its specific spatial recommendations should not be included in the PSP as its underlying assumptions will change through finalisation of the DSS, planning permit, design and delivery process.

5.3 Key PSP Requirements and Guidelines Changes

5.3.1 Amend 3.6.3 Requirements and Guidelines and Plan 11

The PSP seeks the early delivery of extensive future Melbourne Water DSS pipelines assets and compels MAB to deliver the DSS assets as part of the first stage of development - irrespective if there is the required demand for ultimate drainage infrastructure.

The PSP includes the following Requirement regarding the staging of development that will directly impact MAB's development aspirations as:

- R36: *"Prior to the issue of a statement of compliance for any stage of the subdivision of a PSP parcel or the commencement of development of a PSP parcel, all Development Services Scheme (DSS) assets identified for that PSP parcel within:*
- *Plan 11 - Infrastructure and development staging;*
- *Table 19 - Infrastructure coordination requirements – Development Services Scheme DSS assets; and*
- *Table 20 Infrastructure coordination requirements – parcels must be delivered unless otherwise agreed in writing by the responsible authority and Melbourne Water."*

R36 Should be should be reworded as follows:

“R36 The staging of development under a permit should not unreasonably delay the delivery of critical development services scheme assets within the permit area.”

This approach will enable a more equitable approach to the delivery of drainage infrastructure without the obligation resting on MAB to supplement other property owner's drainage.

5.3.2 Final DSS Asset impact on net developable area

MAB submits that suitable notes should be included on relevant PSP plans and text to explain that the final net developable area resulting from the final DSS asset reserves will be resolved when asset designs are approved.

The VPA should use wording such as:

“Final Development Services Scheme asset reserve areas are to be determined post PSP approval to address relevant authority policies and standards and to maximise the efficient use of property.”

The PSP should include principles to be addressed to resolve the final DSS asset reserves that ensure MW Guidelines are met and that which also encourage efficient asset design to maximise property available for employment uses.

The following new Guideline should be added to the PSP:

“Development Services Scheme asset reserves should be finalised after the PSP is approved to the satisfaction of the responsible authority. The DSS reserve areas are estimated based on the best available information at the time the PSP was prepared. The final reserve areas will be resolved at the permit, and post permit functional and detailed design stages having regard to authority policy and standards. The following should be considered when the reserve areas are finalised:

- The need to maximise developable property and minimise the reserve area.*
- The need to ensure residual shapes of developable property are, to the extent practicable, regular and developable shapes and sizes.*
- The need to minimise the cost of development because of the reserve, for example having regard to consequential requirements to undertake earthworks on adjacent development property.*
- The need to ensure that DSS assets are designed in the most efficient way, such as the necessary functions required by the DSS and relevant authority standards.*
- The need to consider alternative configurations of reserve functional assets to ensure the most efficient design is achieved.”*

The following should be added to section 5.3 of the ICP immediately prior to section 5.4:

“The final area of Development Services Scheme asset reserves will be resolved through the post PSP and ICP approvals processes. It can reasonably be expected that the final reserve areas will differ from the areas in the PSP and ICP property budgets.

If a reserve area required at detailed design is larger than the area provided in the ICP property budget, then no ICP contribution is required of the reserve area, including any additional area beyond the relevant ICP property budget. Alternatively, if the final reserve area is lesser than that provided in the relevant property budget, then no ICP contribution is required on that property.

This ensures that ICP contributions are balanced and ensures that funds are not over collected for ICP projects.”

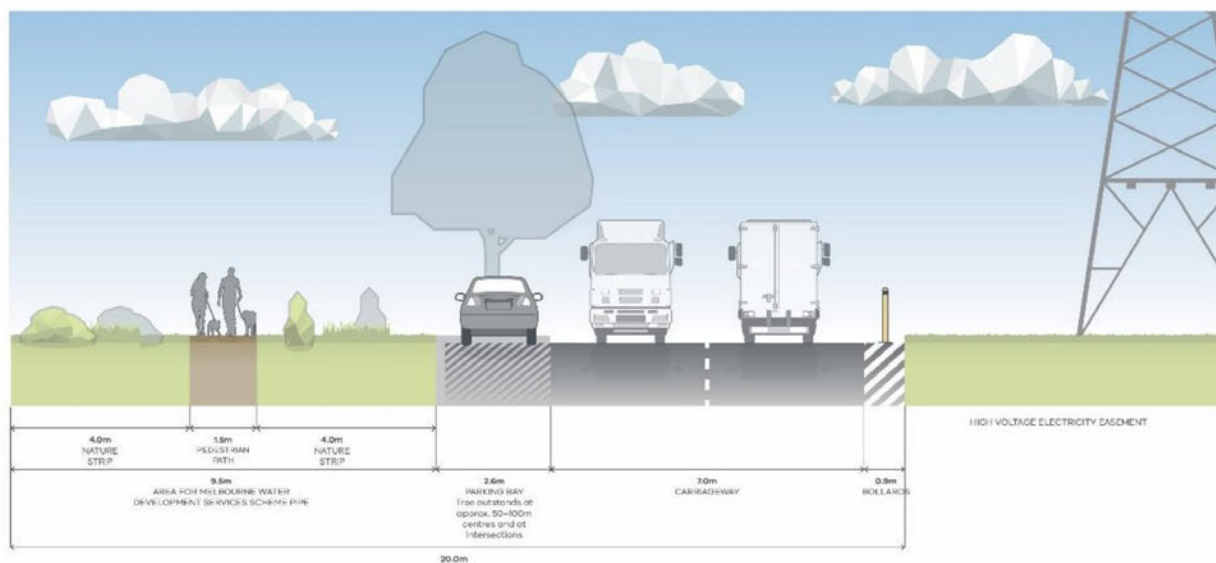
5.3.3 R8 and Local Access Street Level 2 – Industrial / Diversion Underground Pipe (20 m).

As outlined in Submission A, the diversion pipe should cater for Q100 flows. Therefore the “Local Access Street Level 2 – Industrial / Diversion Underground Pipe (20 m)” section is redundant and should be removed from the PSP. R8 should also be deleted. **Figure 9** below is the relevant diagram from the PSP which MAB submits should be deleted.

The PSP should enable the final form and specific location of the diversion pipe to be dealt with at subdivision permit stage to relevant agency requirements at the planning permit stage and a note should be added to relevant PSP plans to reference to indicate this.

Figure 9 – Industrial Diversion Underground Pipe (20m)

Local Access Street Level 2 – Industrial / Diversion Underground Pipe (20m)



6. Submission D – PSP document changes

6.1 PSP Plan Changes

Table 4 – Proposed PSP Plan Changes

Issue	Summary of Change Sought	Justification
Extend “Industry”	<ul style="list-style-type: none"> - Expand Industry on PSP Plan 2 north to Thompsons Road generally between IN-01 and the western edge of WLRB2 as indicated Figure 7 above. - Adjust relevant PSP Plans including PSP Plan 2 and 6 to indicate industrial use of the easement outside of the VDP cable and its management area. 	<ul style="list-style-type: none"> - This change will provide critical short-term industrial property supply. - The MAB Property has the largest buffer to surrounding residential areas making it ideal for light industry.
Native Tree Retention	<ul style="list-style-type: none"> - Delete PSP Plan 8 and identify the High Value Vegetation in Figure 2 shown on the Spiire significant vegetation assessment plan. - Apply amended tree protection requirements and guidelines in the PSP. Include the Spiire identified significant vegetation on the Precinct Features Plan and require permit applications to respond to them. 	<ul style="list-style-type: none"> - The exhibited PSP Plan 8 is not appropriate as it requires that extensive planted native trees should be retained, such retention would significantly disrupt the achievement of the PSP outcomes. Tree retention is not required by the Melbourne Strategic Assessment (MSA) and a conservation area is not designated under the Biodiversity Conservation Strategy (BCS). - G18 already provides for design responses to respond to “<i>existing vegetation that make a significant positive contribution to place character, amenity, cultural and/or ecological value</i>”. This is an adequate approach to protect key trees that contribute to place making and character.
Alignment of east-west connector street	<ul style="list-style-type: none"> - Adjust Connector Street. Adjust the east-west connector street alignment to ensure efficient property development. 	<ul style="list-style-type: none"> - The east-west connector street should be angled to cross the MWC Water Pipeline at 90 degrees so that the impact of angled roads on development efficiency is minimised. A 90-degree crossing is the preferred engineering design.
Use of Electricity Easement	<ul style="list-style-type: none"> - Industry on Electricity Easement. Show the MAB section of the electricity easement as industry on PSP Plan 2 to ensure the electricity easement can be used for industry consistent with Ausnet easement restrictions and policies. 	<ul style="list-style-type: none"> - The electricity easement property adjacent to the industrial area has economic value to support industrial uses. MAB accepts that vehicle access to that property would be restricted to any approved by the Department of Energy, Environment and Climate Change (DEECA). - There is an opportunity for access to the MAB easement property from Casey Fields Boulevard south of the VDP. Suitable guidelines can manage the visual

Issue	Summary of Change Sought	Justification
		outcomes on the site, respect the easement requirements and fully protect the VDP cable.
Bushfire Plan	<ul style="list-style-type: none"> - Delete Bushfire Plan. Delete the PSP Plan 10 Bushfire Plan and update relevant requirements and guidelines. 	<ul style="list-style-type: none"> - The VPA's Terramatrix bushfire report should be recognised as a background report used to inform the PSP, but its specific spatial recommendations should not be included in the PSP as their underlying assumptions will change through the permit, civil design process.
PSP Staging Plan	<ul style="list-style-type: none"> - Remove Unreasonable Staging Requirements and unreasonable restrictions on the staging of infrastructure depicted on PSP Plan 12 and Table 19 and amend R36 which activates them. - R36 should be reworded as follows: <i>"R36 The staging of development under a permit should not unreasonably delay the delivery of critical development services scheme assets within the permit area."</i> 	<ul style="list-style-type: none"> - The exhibited PSP drafting is unreasonable as it seeks the early delivery of hundreds of metres of DSS pipelines by MAB well ahead of adjacent subdivision works. If the VPA's staging objective is to enable development of the north-western area of the PSP before the DSS pipelines are delivered through normal subdivisional works, then a more appropriate approach is to include new wetland SBRB1 on Property 15 which will enable early development of that catchment. - The changes to R36 will enable a more equitable approach to the delivery of drainage infrastructure without the obligation resting on MAB to supplement other property owner's drainage.
Drainage Investigation Areas	<ul style="list-style-type: none"> - Finalise the DSS before the PSP is adopted. Remove the "DSS Investigation Areas" from the final PSP to provide certainty for all stakeholders. 	<ul style="list-style-type: none"> - MAB supports the approach to include the drainage investigation areas in the exhibited PSP. However, the DSS should be finalised before the PSP is adopted to provide certainty for property owners.
DSS Asset Reserve Areas Refinement	<ul style="list-style-type: none"> - Final Net Developable Area. Add notes to relevant PSP plans and text to explain that the final net developable area will be resolved when final asset designs are approved. Include guidelines to encourage efficient asset design to maximise property available for employment uses. 	<ul style="list-style-type: none"> - This makes it clear that it is expected that the final reserve areas will be refined further post PSP approval. Some adjustment to the text around the PSP and ICP property budgets is also required.

6.2 PSP Requirements and Guideline Changes

Table 5 – PSP Requirements and Guideline Changes

Section / Category	Summary of Change Sought	Rationale
Diversion Pipe Delivery	<ul style="list-style-type: none"> - Flexible Diversion Pipe Delivery. Add a new requirement to ensure there is flexibility for the final form of the delivery of the diversion pipe. The requirement should allow for the pipe to be within a lot protected with an easement, road or public space. A note should be added to relevant PSP plans to this affect. Anything that indicates a fixed location for the pipe should be removed from the PSP. 	<ul style="list-style-type: none"> - The final form of the diversion pipe delivery should be flexible and the location within a road, public space or a lot to the satisfaction of MWC and the responsible authority. The conceptual design should be resolved at the permit stage based on permit stage masterplans.
Employment Area Character Outcomes	<ul style="list-style-type: none"> - Character Area Guideline Flexibility. Change the status of R14 to a guideline or reframe its drafting as a “must consider” or “must respond to” requirement. 	<ul style="list-style-type: none"> - R14 states that subdivision must be “<i>in accordance</i>” with the character outcomes. The character outcomes are written as higher level statements, which by their nature will be performance based.
Commercial Building Guidelines	<ul style="list-style-type: none"> - Revise the drafting of R17. R17 should be adjusted from “must” to “must consider and respond to” to better reflect the high-level nature of the outcomes sought. R17 should also be amended to support large scale commercial buildings along Thompsons Road, except where they are adjacent to residential development. 	<ul style="list-style-type: none"> - Given the width and significance for freight and other traffic that Thompsons Road is planned to accommodate, it is submitted that large scale buildings can be accommodated without unduly impacting the amenity of any residential development adjacent.
Native Vegetation Retention	<ul style="list-style-type: none"> - Delete R21 and replace it with a new guideline. R21 should be amended as marked in red font below: <i>“Removal and retention of native vegetation should consider and respond to must be in accordance the Croskell (Employment) Native Vegetation Precinct Plan June 2024 or Plan 8Native vegetation retention and removal.”</i> 	<ul style="list-style-type: none"> - R21 is currently drafted as “<i>in accordance with</i>” which does not allow for flexibility and a performance-based approach. It is also at odds with the drafting of the native vegetation retention on exhibited PSP Plan 9 which states “<i>native tree that should be retained</i>”

Section / Category	Summary of Change Sought	Rationale
Significant Tree Retention	<ul style="list-style-type: none"> - Adjust Tree Retention Requirement. Revise G20 to be consistent with Submissions C3, C4 and D9. G20 should be changed as follows, changes marked in red font: “Retained trees Arborist assessed native trees and MSA timestamped native vegetation and scattered trees identified as “should be retained” on Plan 8 Native vegetation retention and removal should: <ul style="list-style-type: none"> - <i>Where safe and practical, be retained in publicly accessible spaces such as road reserves, local parks or drainage reserves.</i> - <i>Be retained within private lots unless otherwise agreed to in writing by the responsible authority.</i> 	<ul style="list-style-type: none"> - This will provide an appropriate framework for the protection of key trees that have landscape value.
Commercial Building Interface with Wetland Reserves	<ul style="list-style-type: none"> - Commercial Building Guidelines. Promote commercial buildings to interface with WLRB2 asset without a local street separation. Revise G23 so that it relates to residential development only and create a new guideline to encourage commercial buildings to front DSS assets without a local street between them. Revise G25 so that it does not apply in certain circumstances, for example in relation to a commercial interface where bushfire matters can be addressed through means other than a one-sided road. - Add the following to the end of G23: “Where subdivision and development within the long-term commercial opportunity areas does not provide a local street separating development from development services scheme assets, sporting 	<ul style="list-style-type: none"> - The new Guideline should be included to encourage commercial buildings to front DSS assets without a local street between them.

Section / Category	Summary of Change Sought	Rationale
	<p><i>reserves, utility easements and local parks a suitable urban design outcome must be provided that promotes overlooking and engagement of the built form with the green space to provide a safe, and attractive outcome to the satisfaction of the responsible authority."</i></p> <ul style="list-style-type: none"> - G25 should be revised so that it does not apply in certain circumstances, for example in relation to a commercial interface where bushfire matters can be addressed through means other than a one-sided road as follows: <p><i>"G25 Subdivision adjoining a bushfire hazard area should include a publicly accessible perimeter road. Where such a road is not provided, an alternative design response that addresses bushfire management as well as urban design issues should be provided to the satisfaction of the responsible authority."</i></p>	
Bushfire Hazard Management	<ul style="list-style-type: none"> - Update Bushfire Hazard Management Requirements. Replace R34 with a new Bushfire Hazard Management Plan requirement. The following changes should be made to R34 in red font: <p><i>"Development adjoining bushfire hazards shown on Plan 10 Bushfire must be set back in accordance with Table 16 Bushfire hazard vegetation must provide a suitable management and setback requirements unless the bushfire hazard has been removed to the satisfaction of the responsible authority."</i></p>	<ul style="list-style-type: none"> - The Terramatrix report provides a comprehensive approach to consideration and mitigation of bushfire risks. However, much of the detail within the plans will change through the post PSP design and approvals phases. Therefore, its specific plans should not be included in the PSP. - The UGZ already requires applications to include a bushfire management plan. This should have regard to the Terramatrix Report but be finalised based on the permit application plans.
Landscape Management	<ul style="list-style-type: none"> - Bushfire Landscape Management. Submission D11 – Replace R35, G27 and 	<ul style="list-style-type: none"> - R35 conflates planning, urban design and landscape maintenance issues across future public property and private development sites. R35 should be re-

Section / Category	Summary of Change Sought	Rationale
	<p>G28 with a new Landscape Management Plan requirement.</p> <p>New G28 would replace R35, G27 and G28: <i>"G28 landscape design and plant selection in open spaces, including waterways and drainage corridors, should be designed so the vegetation is classified as excluded vegetation as defined by section 2.2.3.2 in Australian Standard AS 3959:2018 not increase bushfire risk."</i></p>	<p>cast so it can clearly relate to different forms of development in appropriate ways.</p>
DSS Works Delivery	<ul style="list-style-type: none"> - Delete R36 and replace with a new requirement. R36 should be deleted and replaced with the following: <i>"Prior to the issue of a statement of compliance for any stage of the subdivision of a PSP parcel, necessary Development Services Scheme (DSS) assets to support the development must be constructed to the satisfaction of the responsible authority."</i> 	<ul style="list-style-type: none"> - Requirement 36 is unreasonable as drafted and seeks to require early delivery of extensive DSS works well ahead of subdivision works. Although it states it is <i>to the satisfaction of the responsibility authority and Melbourne Water</i>, its underlying requirement is not reasonable or commercially feasible to deliver. - If Melbourne Water wish to accelerate construction of DSS assets, then it has powers to do so, including property acquisition powers and the ability to construct major drainage works.

6.3 Infrastructure Contribution Changes

Table 6 – Infrastructure Contribution Changes

Section / Category	Summary of Change Sought	Rationale
DSS Reserve Flexibility	<ul style="list-style-type: none"> - Flexibility for drainage asset finalisation. Make changes to the ICP text and plans to ensure there is flexibility for drainage and services to be in locations approved by the relevant authority. 	<ul style="list-style-type: none"> - The changes provide a clear expectation that assets will be refined and that the ICP is designed to facilitate that process.
ICP Cost Review	<ul style="list-style-type: none"> - ICP Cost Review. MAB's technical team is reviewing the ICP costs for delivery of relevant MAB projects. When this review is complete, MAB will provide this to the VPA and seek discussions is required to resolve any material issues. 	<ul style="list-style-type: none"> - MAB expects to deliver several ICP projects and is therefore verifying that the relevant costs are appropriate. Updating costs will help ensure projects can be delivered in a timely way.

6.4 Urban Growth Zone Scheduled (UGZ)

Table 7 – Urban Growth Zone Schedule (UGZ)

Section / Category	Summary of Change Sought	Rationale
Casey Fields Boulevard Applied Zone	<ul style="list-style-type: none"> - Amend Table 1 to apply the correct zone to Casey Fields Boulevard. 	<ul style="list-style-type: none"> - Amend Table 1 so Casey Fields Boulevard has the Industrial 3 Zone or Commercial 2 Zone applied to it, as appropriate. This is a minor correction only.
Drafting Clarification	<ul style="list-style-type: none"> - Amend Conditions and requirements for permits. The first Clause in section 4 of the UGZ Schedule applies a Small Lot Housing Code provision to any lot less than 300m² in size. 	<ul style="list-style-type: none"> - This should be amended so it does not apply to a non-residential lot. This is a minor clarification only.
Arboriculture Report	<ul style="list-style-type: none"> - Arboriculture report. An arboricultural report should not be required for all trees within the specific properties. 	<ul style="list-style-type: none"> - The UGZ requirement in relation to the Arboricultural Report should be amended to only relate to trees identified for retention in the Existing Features Plan.
Bushfire Management Plan	<ul style="list-style-type: none"> - Bushfire management plan. This clause should be revised so it is consistent with submission D8. 	

6.5 Special Use Zone schedule (SUZ)

Table 8 – Urban Growth Zone Schedule (UGZ)

Section / Category	Summary of Change Sought	Rationale
Easement Prohibited Use	<ul style="list-style-type: none">- Prohibited Property Uses. The Special Use Zone should be amended on Plan 2 as Industry to maximise this area for compatible employment uses.	<ul style="list-style-type: none">- This provides greater flexibility and certain employment uses such transport terminal, (e.g. bus terminal) or Plan nursery.