

9<sup>th</sup> October 2024

Victorian Planning Authority  
Croskell (Employment PSP)

Via: [croskellemployment@vpa.vic.gov.au](mailto:croskellemployment@vpa.vic.gov.au)

Dear Sir / Madam

**Re: Croskell (Employment) PSP – Submission to Draft Amendment C296case  
340S, 350S and 360S Narre Warren – Cranbourne Road, Cranbourne East**

Moremac Property Group (**Moremac**) acts on behalf of Spring Lodge Farms Pty Ltd, the owner of the above properties (the **Land**). Part of the Land is included in the Croskell (Employment) PSP and the following contains our submission in response to the public exhibition of the Draft Amendment C296case.

While the gazettal of the Croskell (Employment) PSP (the **PSP**) will be welcomed by our client, Moremac has concerns with a number of aspects of the PSP in its current form. KLM Spatial has prepared the attached detailed submission for the VPA's consideration, however the main concerns with the PSP can be summarised as follows:

1. The Drainage Strategy prepared by Melbourne Water and its consultant team is overly conservative and as such the drainage assets are oversized.
2. The interface with the industrial land to the east of the Land needs to be reviewed and an appropriate transitional use identified.
3. The housing densities and subsequent yields are based on inappropriate assumptions regarding amenity.
4. The requirements for 12% affordable housing are inappropriate and should be deleted.
5. The Bushfire Development Report is based on incorrect assumptions and needs to be completely reviewed, as it is overstating bushfire risk.
6. The Native Vegetation Precinct Plan needs to be reviewed as vegetation does not meet the thresholds for retention.

In addition to the items above, there are several observations that need to be reviewed and addressed. These are detailed in the KLM report.

The following is an overview of the items we wish addressed and included in the final PSP.

## Drainage Strategy

Incitus was engaged to review the Melbourne Water drainage strategy and determined the following:

- The assumptions were overly conservative and as a result the drainage assets are oversized.
- The increase in the size of the proposed east-west diversion pipeline would allow the 1% AEP plus climate change post development to be conveyed to WLRB2 and remove the need for the VDP crossing.
- This would also remove the need for the proposed drainage channel H1 that runs along the southern boundary of the transmission easement.
- There is a need for a sediment pond to provide primary treatment for Land Parcel 16.
- Investigation Area 1 and 4 are not required.

We have had the Incitus work peer reviewed by Stormy Water Solutions and they provide in principle support. We therefore seek the adoption of the Incitus findings and the appropriate amendments to the Drainage Strategy prior to the PSP being gazetted.

## Interface with the Industrial Land

Currently, the PSP has the eastern section of the northern parcel of the Land zoned as industrial. This is not appropriate for the following reasons:

- There is insufficient area within the subject land to transition from existing GRZ to industrial.
- It is not appropriate that the Land provides a transition for a use that is as yet unknown and therefore any transition should be managed by the owner managing the adjoining development.
- Title/land ownership boundaries are a more appropriate line for land use change.

We believe the Land should be zoned Residential, with the adjoining property providing the transition to industrial on their land. We suggest an approach consistent with that on our northern boundary with 1450 Thompsons Road where Mixed Use has been nominated.

## Housing Densities

The PSP produces an unrealistic yield on the back of a requirement to deliver densities of 30 dwellings per hectare adjacent to areas inappropriately deemed to be "Amenity Areas". The PSP yield for 30 dwellings per hectare is 60% of the total dwelling yield and is cannot be achieved for reasons set out in KLM Spatial's report.

However, the fundamental issue is the allocation of the transmission easement as an "Amenity Area". This needs to be reviewed for the following reasons:

- Dwellings with this interface usually have a lower value because of the proximity to the transmission towers.
- There are limited activities and uses within the easement which would increase amenity.
- The PSP proposes a share path only. No other activities are proposed to be funded or delivered within the easement.

In addition, the Land is outside the defined areas of amenity such as activity centres, passive open space or schools and therefore the appropriate density is 20 dwellings/ha.

### **Affordable Housing**

The requirement to achieve 12% affordable housing is inappropriate as the PSP requires it to comply with the *City of Casey Affordable Housing Strategy 2020*. This document is not incorporated nor is it a background document to the Casey Planning Scheme. Further, it is to be reviewed in December 2024 and as such there is no confidence in what the outcomes of such a review will provide.

We therefore seek the removal of this requirement.

### **Bushfire Development Report**

The report needs a full review as it adopts incorrect classifications and assumptions on future vegetation. As such, it overstates the bushfire risk to both existing and future development. Further, its findings suggest that the assets to be delivered within the PSP are in breach of the Planning Policy Framework.

We seek a full review of the Bushfire Development Report.

### **Native Vegetation Precinct Plan**

We engaged Nature Advisory to complete a site inspection of the vegetation. This confirmed that the vegetation on or adjacent to the property was not not meet the thresholds for retention.

We seek the review of the WSP background report and that the vegetation on the Land is identified as "not to be retained".

### **Conclusion**

We acknowledge the work completed by the VPA and appreciate the opportunity to present our feedback on the PSP. Once the VPA has reviewed this submission, we are happy to meet to discuss our position further.

We also note that we have met with the VPA, the City of Casey, Melbourne Water and MAB to discuss the drainage solutions for the PSP. We believe there is a solution that significantly reduces the land take of the drainage assets, however, acknowledge there is further work to be done. We extend an invitation to the VPA and Council to facilitate a workshop/meeting to reach a mutually agreed solution on the drainage strategy.

Should you have any further questions, feel free to call me on [REDACTED].

Yours sincerely



Martin Gaedke  
**Development Director**  
**Moremac Property Group**