

Reply To Marshal Melbourne

Ref 40068_CroskellPSP

11 October 2024

Victoria Planning Authority
Level 25, 35 Collins Street
MELBOURNE VIC 3000

Dear [REDACTED],

**Croskell (Employment) PSP – Amendment C296case
Public Exhibition Response
1450 Thompson Road, Cranbourne East**

Marshal Melbourne has been engaged by Cranbourne 1450 Holding Pty Ltd ATF Cranbourne 1450 Holding Unit Trust, the purchaser of 1450 Thompson Road Cranbourne East to review and prepare this submission to Amendment C296case and we make this submission on their behalf and the Land Owner's behalf, Glen Favero. Our subject site is identified in Figure 1 below.

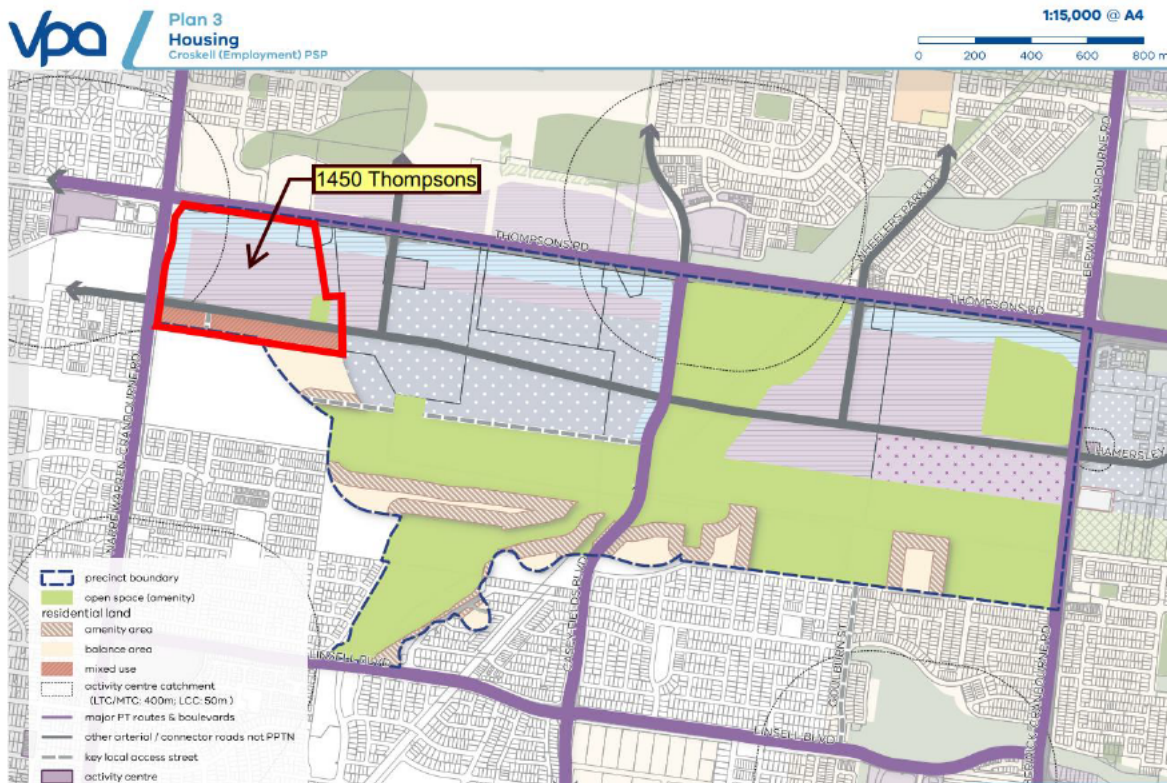


Figure 1 - Location of Subject Site (Source: VPA Plan 3)

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On behalf of our client, we congratulate the VPA on the Exhibition of Amendment C296case and all the work done to date by the VPA, Melbourne Water and Council. We take this opportunity to provide a submission on key matters of interest to 1450 Thompson Road regarding the PSP.

The matters raised in this submission should be read alongside the enclosed:

1. **Appendix A** – *2403000 Croskell PSP Response R01* by WaterStudio, dated 9 October 2024
2. **Appendix B** – Memorandum of Heritage Advice – Bryce Raworth, dated 7 October 2024
3. **Appendix C** – Preliminary Arboricultural Assessment – Sustainable Tree Management, dates 3 October 2024
4. **Appendix D** – *IN-04 Marshal Review (ICP Page 5)* by Marshal, dated 9 October 2024.

Reservation of Rights

As mentioned above, we are pleased to provide this submission on the Exhibited Croskell PSP.

Our client however reserves their rights to make further submissions to a convened Planning Panel that may be appointed by the Minister to consider submissions.

Further, there is a lack of detail and firm positions on a number of items in the PSP (Drainage, ICP costings, ICP land equalisation etc) which our Clients reserves the right to make further submission on.

Our client also reserves the right to make further submission that may be of interest to them including in response to any other submission which may have been made by another party.

Zoning/Place Based Plan

1. Proposed Schedule 16 to the Urban Growth Zone applies two zones to the land subject to this submission being the Commercial 2 and Mixed Use Zones, with further design and development controls included within the PSP on how subsets of the of the Commercial 2 Zone land is to be developed (refer table 9).

We support the application of the Commercial 2 Zone on the majority of the subject land in allowing for the appropriate use and development of the overall precinct for employment-based uses, however, do not agree with the application of the Mixed Use Zone.

Our understanding is that the premise of the Mixed Use Zone's application is to act as a buffer between the residential land to the south and commercial land to the north, which has been confirmed in correspondence with the VPA. We do not agree that this is the best outcome and request that the application of the Commercial 2 Zone also be applied to this land with similar design/development controls (table 9) as outlined in the PSP.

Our Client's intention is to develop the entirety of the land for the purposes of employment based uses and they do not intend to deliver any residential uses. The VPA has confirmed in correspondence that there would be no controls mandating the delivery of residential on this land, therefore given our Client's intent and the VPA's clarification, the Commercial 2 Zone will better reflect the proposed uses and development.

The Commercial 2 Zone for this land would result in an improved planning outcome where design controls (including Council's employment land design guides) could better be used to provide the adequate buffers whilst also facilitating the flexibility of the east-west Connector Road alignment to be assessed at Planning Permit application stage under the 'Generally in Accordance' principle. This flexibility would be unavailable were a separate zone to be applied to the south of the east-west connector and the site's southern boundary.

Furthermore, the flexibility of this road alignment may contribute to its earlier delivery, with the road's current alignment in the property to the east traversing a septic pond associated with the abattoir, a location that is likely to delay its ultimate connection to the east.

We therefore submit that the application of the Commercial 2 Zone to the entirety of the land will not compromise the amenity of the residential land to the south any more than the Mixed Use Zone, will better reflect the proposed uses and facilitate the timely delivery of ultimate east-west connector road.

We further request that should it be determined that mixed use zoning be retained between the southern boundary and the east-west connector road, that the definition of the land acting as a buffer be re-worded to remove the words buffer to allow flexibility at planning permit application stage to allow the connector road to be relocated to the boundary should the surrounding landowners and Council deem it to be an advantageous outcome.

Mixed Use Zone

2. Whilst we maintain our position that the Commercial 2 Zone would better achieve the purposes of the employment precinct and through already proposed design controls provide an improved buffer outcome, we make the following submissions with regard to residential uses within the Mixed Use Zone:

- 2.1. **Requirement R1** reads as a mandatory requirement that subdivision for residential development must be delivered in accordance with **Plan 3** and **Table 3** housing density and diversity.

For the land subject to this submission being 1450 Thompsons Road, in which the Mixed Use Zone will apply, it is unclear whether the density and diversity requirements would apply if no residential development was proposed.

In this regard we submit that clear guidance should be provided that if residential development is not proposed, the objectives, guidelines and requirements of the PSP and Planning Scheme ordinance not apply where no residential development is proposed.

- 2.2. **Guideline G2** seeks that all applications for Residential Subdivision and Development should demonstrate how they will contribute towards the target of delivering 12% minimum of all housing as affordable. This 12 percent target has been drawn from the Casey Council Affordable Housing Strategy as the total percentage of affordable housing that would need to be delivered to meet the total future estimated affordable need by 2041. This percentage requirement is for a municipality wide requirement and does not address the variations between suburbs within the Casey Council boundaries. Furthermore, the percentage is a whole of affordable requirement which would include social housing/other housing options not provided by the private sector.

Given the broad approach of the Casey Affordable Housing Strategy and the simple translation of the 12 percent into a Planning guideline, we submit that a better approach would be to that adopted by the Planning Panels in both the Beveridge North West and Shenstone Park Precinct Structure Plans to not specify a percentage.

- 2.3. **Table 3** of the PSP seeks a target density of 30 dwellings per/ha on the land where the Mixed Use Zone is applied.

Per the above, we seek clear guidance that if residential development is not proposed, the objectives, guidelines and requirements of the PSP and Planning Scheme ordinance not apply.

PSP General

3. **Restriction R10** requires that vehicular access to commercial/industrial properties fronting Thompsons Road, Berwick-Cranbourne Road and Narre Warren-Cranbourne Road must be from connector streets, service roads, internal loop roads or rear laneways.

We request that the requirement be revised to read:

Vehicular access to commercial/industrial properties fronting Thompsons Road, Berwick-Cranbourne Road and Narre Warren-Cranbourne Road must be from connector streets, service roads, internal loop roads or rear laneways, unless otherwise approved by the Responsible Authority and the Department of Transport and Planning.

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4. **Plan 4 – Connector Road South** – shows a Local Access (20m) providing interconnectivity to the existing residential area to the south from the east-west connector road.

We are requesting that the location of this road be shifted to the east to:

- maximise the drainage potential of this road as an overland flow path for the entire north-west corner of the PSP; and
- maximise the permeability of the Local Park (LP-01) and Heritage Site to the residential land to the south.

5. **Restriction R17** which provides guidance for the development of buildings fronting Thompsons Road, Berwick-Cranbourne and Narre Warren-Cranbourne Road and requires amongst other things, the provision of a 4m landscape buffer between buildings and the road, and car parking to be located at the rear of the site, all to the satisfaction of the responsible authority.

We request that this restriction be provided as a Guideline rather than a restriction; in order to allow flexibility and creative design/development options to both achieve the desired outcomes but also meet end-user needs.

6. **Table 9** of the PSP provides planned character outcomes for the various employment areas within the PSP. The table for Business (C2Z) identifies that subdivision and development within the Business area should:

Encourage small to medium tenancies and land uses to locate along key local or connector entry streets to allow a greater number of uses to present to the street.

Similarly for Commercial/Office (C2Z) identifies that subdivision and development within the Commercial/Office area must provide lots to support medium to large scale commercial and office uses to establish over time along the arterial road frontages.

Clarification is sought on whether the definition of small to medium to be taken from the City of Casey Employment Land Design Guide 2022, which defines small to medium lots as up 5,000sqm.

7. **Requirement R18** of the PSP requires that canopy tree coverage within the public realm must achieve a minimum 30%. This mandatory requirement does not allow flexibility in the landscaping design for the commercial areas and in particular could result in a reduction in smaller lots in localities where smaller lots are otherwise encouraged by table 9 as result of the higher density of cross overs and service connections where lots are increased.

We request that this requirement be made a guideline or removed given the duplication with guideline G6, which already requires consideration of this matter.

8. **Guideline G21** requires subdivision design and, where applicable, building design should demonstrate how it has responded to the principles outlined under Section 5 - interpretation strategy of the Cultural values interpretation strategy summary report (Feb 2024).

The principles are vague, and it is unclear whether this applies to just open space waterway areas, the vegetation protection zone or every component of subdivision/development within the whole PSP.

We request that this is made clearer in the PSP.

9. LP-01 Park Location

Plan 7 shows the provision of open space on the land abutting the proposed heritage site.

The park size and location appears to have been determined largely based on a desire to link the heritage site and a windmill located on the neighbouring property which is proposed by the PSP to be added to the proposed heritage overlay. As submitted in appendix B, our Heritage Advisor, Bryce Raworth, states that the windmill is very delapidated, not of significant heritage value and does not contribute to the heritage significance of the heritage site. Concurrent to our request to exclude of the windmill from the proposed heritage site, we ask that the park location (and size, per Item 10 below) be reconsidered as detailed below.

Table 13 states the described locational attribute of the park is that it adjoins the heritage site and is centrally located to the surrounding employment and residential area.

We submit that relocating the park to the south of the heritage site, rather than the east, would provide an enhanced outcome by taking advantage of the key views identified on Plan 1 in the PSP.

This key view line retention through the use of open space placement was picked up in the SPIRE Landscape Character Assessment prepared to inform the PSP, with the report providing:

"Views from the Heritage House could be retained through selective road and open space placement around the property so as not to completely obscure this vantage point as this site would serve well as a way finding/orientation point in the landscape, particularly with the large Phoenix Canariensis alongside..."

We request that the park LP-01, as shown on Plan 7, be amended to show the park to the south of the Heritage Reserve.

10. LP-01 Park Size Requirement

Plan 7 and Table 12 allocates a total area of the park of 0.6ha with 0.59ha of this park to be located on the property subject to this submission. Per Item 9 above, this size has been determined largely on the basis of connecting the windmill on the adjacent property which we have submitted in Item 13 is not of heritage value and should not be subject to a heritage overlay.

The Casey Council Open Space Strategy (adopted 17 October 2023) under Local Space standards identifies that a local park located within a commercial or industrial precinct needs to be at least 0.3ha in size. The proposed park is therefore double the size of the minimum requirement under the Casey Council strategy which is a significant departure.

We request that the size of open space 0.4ha requirement would better align with the strategy particularly given the proposed reduction in surrounding residents through the removal of the Mixed Use Zone.

The colocation of the park with the heritage site also assists with a shared area of amenity through the location of a significant envelope around the heritage site and retention of a number of advanced trees. This shared area of amenity will thus have the appearance of the park size being double the requested 0.4ha.

11. **Requirement R34** requires - Development adjoining bushfire hazards shown on PSP plan 10 must be setback in accordance with table 16 unless the bushfire hazard has been removed to the satisfaction of the responsible authority.

We request that requirement be revised to include - or an appropriate Bushfire Management plan has been prepared per the suggestion of the Terramatrix report prepared on behalf of the VPA which references the Thompsons Road PSP requirement as the suggested pathway.

12. **Table 24** allocates a split of 0.36 ha to employment and 0.22 ha to mixed use zone for land equalisation purposes. There is no explanation on how this has been defined. We submit that as the majority of the traffic that will use this intersection will be commercial based and therefore that entirety of the intersection should be included within the Employment land for the purposes of the Infrastructure Contributions Plan and Land Equalisation amounts.

HERITAGE

13. The PSP proposes to reduce size of the existing HO137 Heritage Overlay on the subject site and add a windmill associated with the historical farming of the site into the Heritage Overlay based on the recommendations of a heritage review conducted by Ecology and Heritage Partners (EHP) for the PSP.

Our Client engaged heritage experts, Bryce Raworth, to complete a review of the heritage matters affecting the subject site, including to assess the recommendations relevant the Springmont Farm Heritage Overlay included in the EHP post-contact study of the PSP.

It is noted in their report, included in Appendix B, that the Statement of Significance for the dwelling is reproduced from the *City of Casey Heritage Study Significant Places* as follows:

"The house and associated trees are of local significance for their altered expression of the Edwardian-era, in both house and landscape form, and their association with one of the Clyde pioneering families and prominent local identified, William Hardy. The first Hardy to own this land, Embling Hardy was an early Clyde storekeeper while William Hardy, the builder of the house, was a Cranbourne Shire Councillor 1909-21 and president 1910-11, 1920-1 in the period when this property was developed."

Bryce Raworth notes in their report that:

"The windmill was not identified in the citation for the property within the City of Casey Heritage Study Significant Places. Whether this was because the windmill was not deemed to be a significant element associated with the property when assessed, or because it was not located within the property boundaries and was not assessed as a result is unknown. The windmill is a very modest structure and in a heavily dilapidated state, and there is an argument that can be raised against incorporating it into the Heritage Overlay curtilage. The windmill does not provide a meaningful story about the history of the property, beyond it having previously been a rural farm."

Given that the Statement of Significance states that the overlay pertains to the house and landscape's *altered expression of the Edwardian-era and their association with prominent local identity, William Hardy*, we see no heritage justification to incorporate the windmill into the revised Heritage Overlay.

We request that the proposal to add the Windmill to the HO137 Heritage Overlay be removed.

14. The proposed Heritage Statement of Significance lists a number of tree species which are to be protected as part of the tree controls which are to apply to the site. Our Heritage Advice and Arborists Report do not identify some of the tree species identified as occurring on this site and further clarification is sought on the exact location of the trees referenced.

DRAINAGE

15. **Plan 2 – Place Based Plan** shows Drainage Investigation Area 1 encroaching into our subject site in the area of Mixed Use zone.

While this is only an investigation area and subject to further study / clarification from the VPA/MW, we are concerned that a part of it is located on our site. We note that there is a 7m contour difference from the south boundary of Moremac land to our south boundary, there is no practical way that a drainage facility could be constructed on our property considering the level differences.

We ask that the VPA remove the Drainage Investigation area extents from our client's property.

16. **R27 – Stormwater Management Plan** must include Integrated Water Management solutions consistent with EPA's publication 1739.

Refer to Appendix A Water Studio Report *2403000 Croskell PSP Response R01*, Section 2.1.1.4. We note that the EPA Publication requires significant stormwater harvesting or infiltration to remove a total 37% of impervious run-off. The PSP should look for opportunities for shared stormwater harvesting, infiltration sponges and passive irrigation. Utilising the undevelopable area within the electrical transmission easement should be considered as a low-impact / high benefit location for infiltration measures.

In Plan 7 several initiatives have been outlined that will work towards meeting these targets. However, there is no confirmation that the ideas presented in Plan 7 meet the requirements set out in this publication, and there is no cohesive approach that will guarantee a precinct-wide approach will be implemented.

Integrated water aspirations are a necessary part of development, but they should not be left up to the individual developer to manage within their parcel. We don't want to get to a permit phase of development where we have lofty integrated management obligations to fit within an area that isn't practical and not maintainable.

We ask the VPA to further investigate the impact of EPA Publication 1739 on the PSP and if required, consider implementing outcomes on a precinct-wide shared basis, possibly incorporated into the Drainage Scheme.

17. **R28 – Integrated Water Management Plans** must demonstrate that outcomes identified in a variety of reports are adopted.

Report *Croskell Employment PSP Integrated Water Management Plan* (ARUP, Mar 2024) notes a preferred outcome for stormwater harvesting. We would like to comment that while this may be ideal, we would not support this being a mandatory development outcome as it is notoriously difficult to mandate within Employment precinct with multiple different land-owners.

We request that if this a key PSP outcome, then this be a PSP/ICP funded item funded centrally and not delivered in a fragmented approach.

18. **R33 – Groundwater Licenses** – Prior to construction of any drainage assets in DSS, applicants must obtain relevant groundwater licenses/approvals from relevant authority. It is unclear whether the intention is for applicants to acquire relevant/nearby existing groundwater licenses and abolish them prior to commencement of drainage works.

We request that the VPA elaborate on what it intended by this item and if it is retained, revise this requirement to read as per below, so as not to delay progress of development within the PSP:

"Prior to **completion and handover** of any drainage assets..."

19. **R36 – Infrastructure Coordination** – “prior to SOC for any stage of a subdivision or parcel of the PSP, all DSS assets identified for that parcel in Table 19 must be delivered, unless otherwise agreed in writing by the Responsible Authority and Melbourne Water.”

Our site and many others will not be feasible to deliver if full construction of all downstream drainage infrastructure is required prior to SOC of 'any stage'. This is a critical risk item for our site and the broader PSP, as it won't be feasible for any developer to continue holding costs for sites that won't be permitted development for 5-10 year timelines due to significant downstream assets that are held by external parties.

Melbourne Water is currently taking at least 3 – 4 years to approve the design of wetland/retarding basins, with a current project of ours at 5 years with no detailed design approval of a WLRB yet received from MW. Should drainage infrastructure be required to be completed prior to development of certain sites or all sites as alluded to in the PSP, no employment will be provided for in excess of 6 years after the PSP is gazetted.

Under the current operations of Melbourne Water and Council, the development of every site in relation to on site and off site drainage is negotiated with these two authorities at the time of applying for a permit. We also note that it is through the development of sites that drainage scheme contributions are paid which ultimately fund the acquisition drainage assets by Melbourne Water / Council and progress reimburse the cost of said drainage assets. If development does not occur prior to or concurrently with the delivery of drainage assets, there will be no funds to deliver the works.

We request that the reference and requirement to stage development based on drainage is removed on the basis that this is already at the discretion of Council and Melbourne and is an unnecessary hindrance on the delivery of employment land. If this requirement is retained, we request that MW/VPA confirm that development can proceed with temporary/interim retardation & treatment on-site on the basis and condition that it mitigates risk to downstream developers and retards flows across the VDP cable.

20. **Plan 11 – Drainage Strategy - Pipe E** – Melbourne Water's Exhibited drainage scheme solution for the Croskell PSP can be found at <https://letstalk.melbournewater.com.au/croskell-psp-draft-drainage-strategy>, and is outlined in the *Drainage Strategy Concept Design Report (W4G 2024)*, by Water4Good, dated 28 June 2024.

This drainage strategy proposed by MW is identified as 'Option 4A' of the Water4Good report, which effectively shifts all 5% AEP flows into a bypass pipe (referred to in Plan 11 as Pipe E), to ensure that flows over the VDP cable easement are restricted to pre-developed rates and volumes. Excess flows over this 5% AEP pipe are intended to be conveyed east overland in an industrial access road (22m width) parallel to the VDP cable easement, 1.5km east into the WLRB2 in the MAB property 1580 Thompsons Road.

Refer to Appendix A Water Studio report *2403000 Croskell PSP Response R01*, which investigates the MW/Water4Good drainage strategy in detail and presents our position on the drainage strategy. Broadly, the report is split into three sections:

- a) **Exhibited Solution** - is not feasible to deliver by the PSP, as outlined below.
- b) **Proposed Solution** – is our proposed solution that still maintains the constraints set out in the Water4 good report, however is more feasible to deliver.
- c) **Ideal Solution** – is an ideal drainage solution that follows the existing contours of the PSP and presents the best cost-benefit engineering solution for the entire PSP. However, this option would require a formalising of the existing VDP cable crossing and rigorous negotiation with Aquasure.

Below, we discuss the above three solutions at a higher level than detailed in Water Studio's attached report.

20.1. **Exhibited Solution** – as outlined in Appendix A, the exhibited solution presents significant constructability issues that result in the delivery of this drainage solution impacting the feasibility of the PSP. The main issues identified are listed below:

- The overland flow path pushes the road up to 5m in depth against the VDP cable easement.
 - This is not acceptable to DEECA/Aquasure and could not be delivered without prime PSP industrial land wasted to facilitate an appropriate sloped batter.
 - If we were to replace the south interface batter with a retaining wall, this would be over 1.1km in length, and be at an exorbitant cost.
- Earthworks – to facilitate the levels of the southern industrial access road for the overland flow path, we have completed a conceptual design of the entire north-west PSP area. See Figure below, we have designed the internal east-west collector road and additional connecting roads north into Thompsons Road to match into existing road levels. To facilitate the levels required for a minimum graded rate (as flat as possible) along the south boundary, the works required are in the region of **2.5 million** cubic metres of earthworks moved on site. This excludes the earthworks required for the flat industrial pads expected in an employment area, which could easily exaggerate the volumes further.

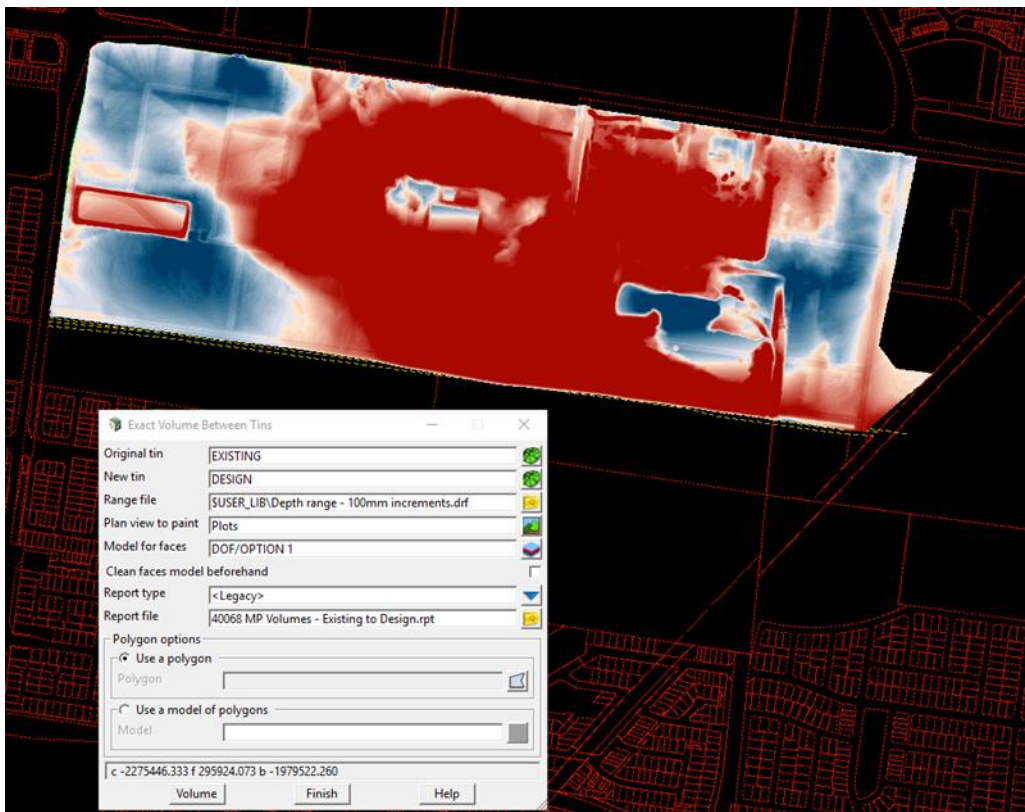


Figure 2 - PSP North-West Area - Extent of Cut (red) and Fill (blue) – Exhibited Solution

- Filling of Moremac land – this drainage solution would require filling of the Moremac land by up to 5m in the south-west corner to ensure their site grades to the east.

- Additional Pipes for Overland Flow – the 22m width industrial access road will not be able to cater for the full gap flow. As such, an additional pipe would be required alongside the Pipe E 2x DN1650 pipes anyway to mitigate the public safety risks of excessive gap flow in the road.

20.2. **Proposed Solution** – as outlined in Appendix A, the Proposed solution simply upgrades the Pipe E to a pipe that can cater for the full 1% AEP flow. This option results in the below benefits to the drainage strategy and overall PSP:

- 1% Pipe – we only add one (1) additional pipe to the Exhibited Solution, so at the outfall to the WLRB2 in MAB land, there are triple (3x) DN1650 pipes.
- The industrial access road against the VDP cable easement follows the existing contours and would only be ~2.0m in fill at its worst location.
- The Local Park LP-02 could be retained in its current location as shown in the PSP.
- Earthworks – designing the roads close to existing levels to minimise unnecessary earthworks, we have completed a conceptual design of the entire north-west PSP area. See Figure below, to facilitate the levels required for minimum graded roads (as flat as possible), the works required are in the region of **1.9 million** cubic metres of earthworks moved on site. This excludes the earthworks required for the flat industrial pads expected in an employment area, which could easily exaggerate the volumes further.

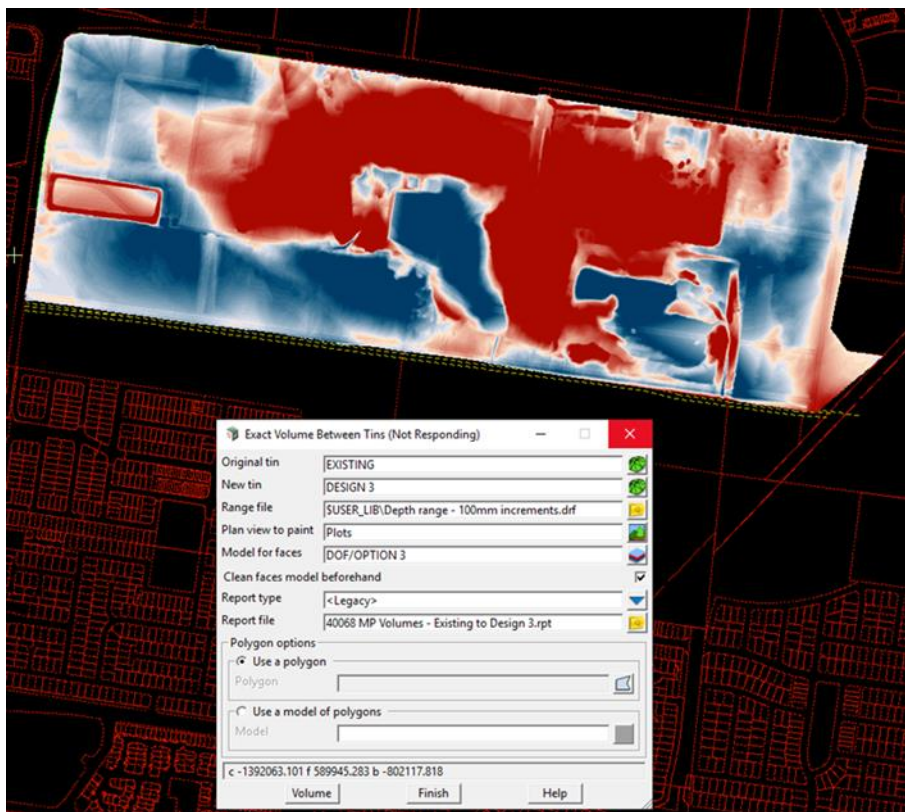


Figure 3 - PSP North-West Area - Extent of Cut (red) and Fill (blue) – Proposed Solution

- Filling of Moremac land – minimal filling on the Moremac land.
- The pre-developed flow is now shifted into the 1% pipe, so the 4.05 m³/s of flow going over the VDP cable in the existing scenario can be effectively used as buffer against storm events in excess of the 1% AEP flood.

- Swale F can be reclaimed as prime industrial developable land, as the pipe interfaces directly with the proposed WLB2.

20.3. **Ideal Solution** – as outlined in Appendix A, the Ideal solution works with the existing topography of the PSP area and allows the entire west catchment to go over the VDP cable in the west. This option results in the below benefits to the drainage strategy and overall PSP:

- No excessively deep or large pipes need to be constructed to go east towards the WLRB2.
- The existing crossing to be upgraded to an engineered solution. There is precedence for this as per recent crossing constructed to the west at Narre-Warren Cranbourne Road.
- Melbourne Water and DEECA have admitted that a negotiation is required with Aquasure for the current Exhibited Solution regardless, therefore there is already an available process that can be used and expanded to deliver an upgraded solution.
- The industrial access road against the VDP cable easement follows the existing contours and would only be ~2.0m in fill at its worst location.
- The Local Park LP-02 could be retained in its current location as shown in the PSP.
- Earthworks – designing the roads close to existing levels to minimise unnecessary earthworks, we have completed a conceptual design of the entire north-west PSP area. To facilitate the levels required for minimum graded roads (as flat as possible), the works required are in the region of **1.9 million** cubic metres of earthworks moved on site. This excludes the earthworks required for the flat industrial pads expected in an employment area, which could easily exaggerate the volumes further.
- Filling of Moremac land – moderate filling on the Moremac land.

20.4. **Plan T1 – Costings** - We have prepared costings of the above mentioned three drainage scenarios to highlight the significant benefit that our Proposed Solution presents to the PSP and Ti-Tree Creek DSS. Please refer to Sections 7, 8 and 9 of the Appendix A Water Studio Report for further detail, see below table summarising the costs. Since the time of our presentation to the VPA/MW in September, we have included costs of removing spoil from site, which has increased the potential benefits of our proposal.

Table 1 - Croskell PSP Drainage Costings

Drainage Option	Exhibited Solution	Proposed Solution	Ideal Solution
Cost to deliver – including removal of spoil from site	\$ 83,860,098	\$ 53,188,354	\$ 46,709,354
Saving to the PSP		\$ 30,671,744	\$ 37,150,744

We note that the above savings are significant and should not be lightly considered. Adopting the Proposed Solution and saving a conservative \$30 million in construction costs results in a more prosperous PSP that better achieves its aims to be economical. It will increase the feasibility of future projects, meaning a higher likelihood of projects being greenlit and commencing.

We request the VPA to re-visit the drainage option for the west PSP catchment to cross the VDP crossing with DEECA and Aquasure so the Ideal Solution we have presented can provide maximum benefit to the PSP. Should this not be pursued we ask that the VPA liaise with Melbourne Water to implement our Proposed Solution.

ENGINEERING

21. **Plan 1 -VDP cable Specific Controls Overlay (SCO)** of 50m width proposed to be placed centrally over the location of the VDP cable. Please see below our queries:
 - 21.1. Please confirm how the 50m width has been determined by the PSP to be the appropriate width applicable to the Croskell PSP. We note that the wording of the GC148 amendment notes that the width of the overlay can be from 1m to 40m wider than the easement, and in urban areas the SCO can be narrower. Noting that this 50m width encroaches future urban development, there could be opportunity for this overall width to be decreased.
 - 21.2. The GC148 amendment requires that any nearby works within the overlay will require referral of applications to DEECA, Council and Melbourne Water, this is a stringent approval process with thorough application requirements. We note that this process could pose a potential risk of unnecessary delay to approval for drainage solutions that are located within the SCO.
22. **R11 restriction** requires a shared path to be constructed along the parcel boundary adjacent to the Thompsons Road arterial road reserve. The provision of this footpath which is to serve a wider catchment and provide an important connection along Thompsons road will require an additional amount of land to be vested with the road reserve.

Noting our comments later on in this submission in Item 27 regarding the possible Thompsons Road reserve widening shown on the FLPs prepared, it has been difficult for us to determine the required widths for Thompsons Road and whether the shared path could be located within the existing road reserve.

Upon confirmation of the required road widths we feel that we would be in a better position to make submission on the location of the shared path, however we request that consideration be given the potential land take of the shared path and inclusion of this within the overall inner purpose public land for the purposes of the ICP calculations.

CROSKELL NATIVE VEGETATION PRECINCT PLAN (NVPP)

23. The proposed Native Vegetation Precinct Plan (NVPP) and subsequently the PSP provides for the retention of two patches of vegetation on the land labelled 11-P and 12-P around the existing dam on the site. At Section 5 of the NVPP it is outlined that native vegetation to be retained has been identified following a strategic approach to retaining native vegetation with greater biodiversity, arboriculture, landscape or other value.

Upon review of all the vegetation assessed and recorded within the WSP report which formed the basis for the NVPP, patch 11-P had the lowest condition score and therefore there seems to be little justification for its retention. The retention of this patch of vegetation is significantly difficult given the required filling of the dam for the construction of intersection IN-04 and development to proceed. With regard to the filling of the dam and removal of the embankment to facilitate development, both patches of vegetation (11-P and 12-P) are located on top of or near to the dam embankment and will need to be removed to facilitate any works for the filling of the dam.

The requirement for patch 11-P to be removed to allow for the filling of land and construction of IN-10 becomes evident when the SMEC prepared infrastructure plans are reviewed which clearly show the part of the vegetation 11-P within the extent of works for the roadway of IN-10.

Section 5.2.1 of the NVPP identifies that:

The native vegetation shown in Table 5 or elsewhere that are (is) to be retained, should not be removed, with the exception of native vegetation that overlaps with the land required to deliver infrastructure projects identified in the Incorporated Croskell (Employment Development Contributions Plan at detailed design phase.

We request that the PSP and NVPP be updated to allow the removal of patches 11-P and 12-P.

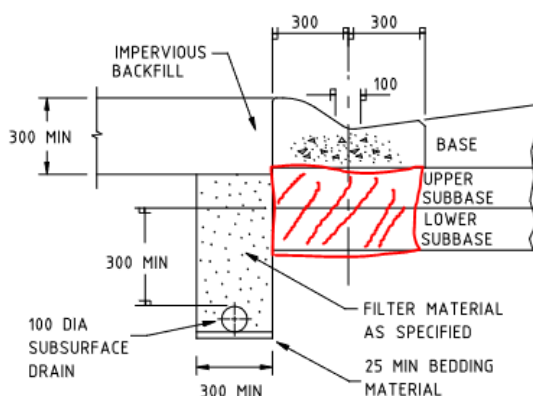
INFRASTRUCTURE CONTRIBUTIONS PLAN (ICP)

24. **Plan 1** – In line with our submission that the Commercial 2 Zone be applied to the entirety of the site subject to this submission, we request that the relevant updates be made to Plan 1 and the relevant land budget tables to show the subject site within the Commercial and Industrial class of development. We also note that if CK-01R is re-assigned from Mixed Use to Employment / Commercial Land use, then the ICP land contribution amount of 0.80ha (16% of Residential area) will be significantly reduced to 0.20ha (4% of Employment area).

25. **ICP Project IN-04** - We have reviewed ICP Project IN-04, as this is the only ICP transport project in the vicinity of our site and will likely be delivered by our Client as a Works-In-Kind project. Further, due to the time constraints of this Exhibition period, we have not had opportunity to review the other ICP projects in great detail. We note that the ICP schedule prepared by SMEC has some significant issues in pricing and scope, which we have listed and addressed below. Please refer to Appendix D for the detailed estimate review.

25.1. Pavement extents

- Pavement areas - appear to have only been measured as trafficable area – they do not account for the additional 600mm width of subbase pavement under kerb. See Figure below, being a sketch of VicRoads Standard Detail SD 1621 – the red hatching is the additional pavement under the kerb. This results in additional pavement area of ~ 270 sq.m.



BEHIND KERB & CHANNEL ON NEW ROADS

Figure 4 - VicRoads Standard Detail SD1621 - Pavement under Kerb

- Pavement area – the area split between primary arterial and collector road pavement has been re-distributed. We note that DTP/VicRoads requirements will trigger at least an 80m approach to the intersection along the collector road (west-bound) to be primary arterial pavement with high-grade asphalt to protect against heavy vehicle braking at the intersection. This is stipulated in *VicRoads Code of Practice RC 500.22 - Selection and Design of Pavements and Surfacing*, page 30, Item 4:

- (4) Where Type V, VP, HG or HP is recommended for use at intersections, it should commence at the start of the turn lane taper or a minimum of 80 m from the stop line or from where heavy vehicles are expected to commence braking, whichever is the greater distance and extend through the intersection and the first 30 m of the departure lanes.

Figure 5 - VicRoads Code of Practice RD 500.22 - page 30, Item 4

- 25.2. Pavement rates - are in the ballpark, however we have slightly increased them.
- 25.3. NEW ITEM 2.3.1 - Subgrade improvement. Site conditions in this area will likely require lime/CT stabilisation which would be ~\$55/sq.m for the pavement area = \$170,000
- 25.4. NEW ITEM 2.3.2 - Interface Pavement works. DPT/VicRoads won't permit pavement works to be completed against the hard edge of existing pavement once the ex. kerb is removed. We will need to interface each pavement layer as per VicRoads requirements, see Figure below which shows how this would typically be implemented.

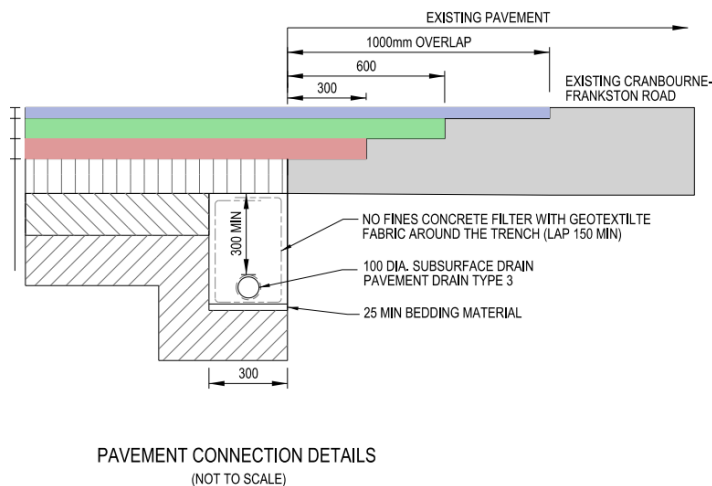


Figure 6 - Typical Pavement Connection Detail for interface with ex. pavement

- 25.5. NEW ITEM 2.3.3 - Asphalt Overlay on Ex. Road. DPT/VicRoads will require a wearing course asphalt overlay of the existing intersection of at least the entire adjacent lane (3.5m width). This area of 587sq.m has been added to the schedule.

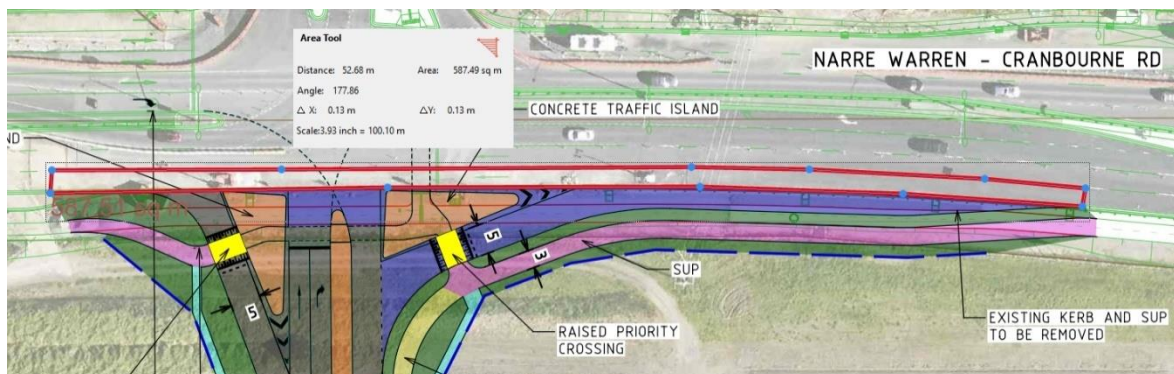


Figure 7 - Croskell ICP IN-04 Intersection - SMEC FLP - Additional Asphalt overlay

- 25.6. Concrete - rates have been slightly increased to be reflective of current industry rates.
- 25.7. Drainage - costs of \$88,500 are under-valued due to an insufficient scope. Typically, drainage for this 4th leg would require a new north deceleration lane drain behind back of kerb and a new drain

25.8. NEW ITEM 4.7 – Subsoil drain no-fine CT will be required along the interface of existing pavement as Per Department of Transport and Planning Section 702 technical requirements and VicRoads SD1621D; this has been added.

25.9. Topsoil – assumes importation of appropriate topsoil for the site, rate has been increased to \$35/sq.m to accommodate this.

25.10. Street lighting - would be closer to \$150,000 for a project of this size and scale.

25.11. Relocations - are not costed. While most services are in the west verge, there is Telecom in the east verge that may require relocation, see Figure below. We have included a \$200,000 allowance to relocate this telecom, as it will need to be re-aligned and lowered to cater for the 4th leg of the intersection.



25.12. Line-marking should be doubled to \$30,000.

25.13. Demolishment of existing pavement/footpath should be closer to \$90,000, based on area of existing concrete footpath, kerb and ~1.0m of existing pavement that will all require removal & disposal offsite.

- 25.14. Dam Filling – Item 10.2 and 10.3 is noted in the ICP Appendix to have an area of 1,960 sq.m. While this is shown on the SMEC plan as the area of dam within the new collector road reserve, the dam area is closer to 18,000 sq.m, please see excerpt from NearMap below. A partial removal of the dam is not feasible, if the intersection were to be completed exclusive of other subdivision works, the full dam would need to be remediated and removed. This results in the cost of the dam de-watering and filling being much larger than allocated in the SMEC estimate. We have also assumed a 3.0m depth dam filling based on preliminary review. In total the dam remediation & removal costs increase from \$355,000 to \$1,620,000.



Figure 9 - Nearmap Image of Site Dam



- 25.15. Dam filling should also include a Level 1 filling geotechnical report, this has been included in our estimate at ~\$40,000.
- 25.16. VicRoads fees are closer to 5% of the value of the project, typically \$200,000 for a project of this scale.
- 25.17. Traffic Management - needs to be reviewed, for such a regionally significant project on a primary arterial road, expected to be in the vicinity of \$500,000.
- 25.18. Environmental Management and Site Establishment for a project of this scope would entail overheads in the vicinity of \$200,000, this item has been updated.
- 25.19. Reduced Contingency to 10%.
- 25.20. **IN-04 COSTING SUMMARY** – considering the above items and the detail shown in Appendix D our detailed costing estimate, our assessment of the value of ICP Transport Project IN-04 is \$6,163,210, increased by 128% from the \$2,700,643 original sum.

We request that the VPA amend the ICP Transport Project IN-04 to be \$6,163,210.

26. **IN-04 Land Take** – is it noted in Table 8 that as per the SMEC FLP of IN-04, there is a land-take of 0.58ha required.

Marshal and our traffic engineer expert Traffix Group have assessed the FLP provided by SMEC. We note that the south left-hand turn lane from the Collector Road into Narre-Warren-Cranbourne Road has assumed a large conservative splay that is not close to the back of footpath. See below Figure, in red hatching we note that at least 60 sq.m of this splay could be reclaimed by the adjacent lot, as there does not appear to be a sight-distance, Austroads or geometric design reason for this large splay.

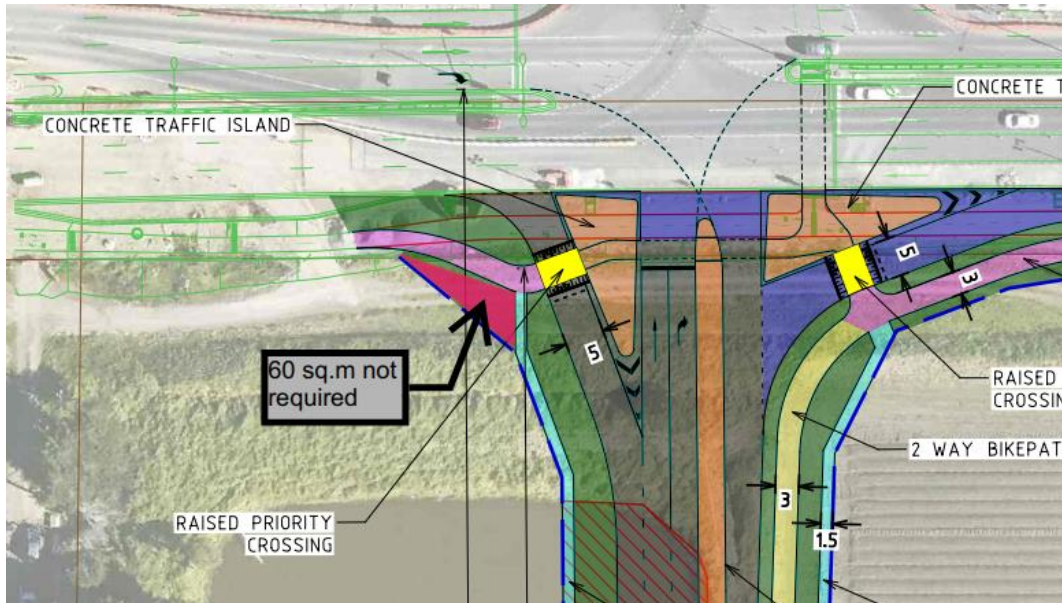
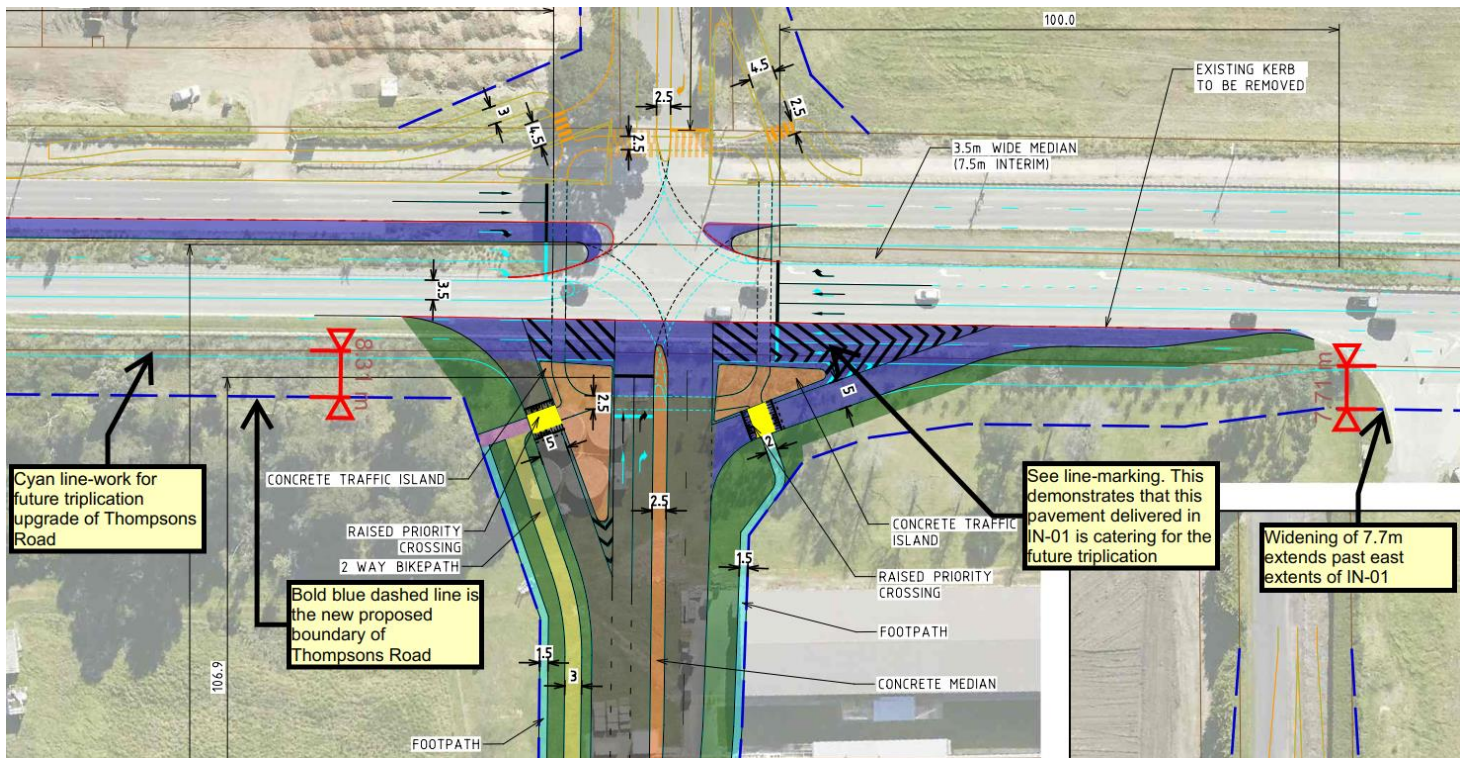


Figure 10 - Croskell ICP IN-04 Intersection - SMEC FLP - southern splay

We request that the VPA revise the land take requirement of ICP IN-04 to be reduced by 60 sq.m.

27. **IN-01, IN-02 & IN-03 Thompsons Road Widening**– SMEC has provided FLP design of both IN-01, IN-02 and IN-03; all intersections on Thompsons Road on the north boundary of the PSP.

As raised in our VPA meeting of 4 October 2024, we note that there is up to a 8.3m road widening of Thompsons Road into private property as shown on the SMEC FLP plans of IN-01, 5.5m of widening adjacent to IN-02, and 5.0m of widening adjacent to IN-03. See the Figure below for this dimensioning on IN-01, with the new title boundary of Thompsons Road shown in a thick bold dashed blue.



It is evident to us that the FLP design of these intersections has been made to consider the future triplication of the Thompsons Road, which requires a consistent widening south of the Thompsons Road boundary. This is confirmed by the below factors:

1. The road widening (shown in dashed blue) appears to extend past the extents of the land widening provided in the ICP for the intersections and continues east and west past the limit of the intersections.
2. Cyan line-work is the future triplication of Thompsons Road, some of this linework is shown in current private property.
3. There is 'dead' pavement provided with 'no-go' dashed line-marking that clearly aligns with the future third lane of west-bound Thompsons Road.
4. IN-02 and IN-03 – the west relocated bus stop is located significantly further south than the current carriageway edge. It appears to be designed to cater for the cyan-coloured linework of the future triplication.
5. Footpaths are located within current private property at a consistent offset to the cyan triplication linework.
6. Plan 2 – Place Based Plan of the PSP shows a dark-grey hatching on the underside of Thompsons Road for the entire north boundary of the PSP, which is consistent with what is shown on the SMEC FLP plans. This dark-grey hatching appears to indicate required road widening.

This widening of Thompsons Road is not shown in the exhibited amendment documentation as Public Acquisition Overlay, nor as ICP land to be factored into the Land Equalisation table.

We note that the VPA has advised us that the further upgrade of Thompsons Road is not considered by the Croskell PSP however it is concerning that a clear widening is shown by the SMEC plans, but not mentioned in any PSP or ICP documents.

Ref

40068_CroskellPSP

We request the VPA re-confirm this with DTP and update the PSP and engineering plans accordingly.

Should the DTP revert and confirm an omission on their end; being that a consistent road widening is required along the south boundary of Thompsons Road; we request that the PSP and ICP is updated ensuring landowners are appropriately compensated for their loss of developable land to a public upgrade.

28. **Land Equalisation Rate** – we note that this rate has not been provided.

We request that the VPA confirm when they expect this rate to be made available.

PLANNING SCHEME ORDINANCE

29. A mandatory condition in the Exhibited Schedule to the Urban Growth Zone requires:

Before the Statement of Compliance for the plan of subdivision is issued (or, in the case of a staged subdivision, the plan of subdivision or masterplan which implements the first stage of the subdivision), or before a building permit is issued (whichever comes first), a dedicated shared path must be constructed between the subject site and existing activity nodes, to the satisfaction of the responsible authority in accordance with the Shared Path Network Plan.

No plan in the PSP shows the location of the existing activity nodes referenced in this condition and extent of shared path required.

We request the VPA provide a plan and further detail to the PSP that shows the existing activity nodes for each site and the for section of the shared footpath that is required to be delivered .

We request that the VPA consider our above response on the Exhibited Amendment C296case to the Casey Planning Scheme, being the Croskell (Employment) Precinct Structure Plan (the PSP).

We welcome the opportunity to further discuss our submission with the VPA, Council, Melbourne Water and DEECA and resolve the raised matters to the mutual benefit of all parties.

Should you require any further information in relation to the above, please do not hesitate to contact me.

Yours faithfully
Marshal Melbourne Pty Ltd.



Clydie Brewer
Executive - Planning

