

Victorian Planning Authority
 RE: Croskell PSP (Employment)
 Level 25, 35 Collins Street
 Melbourne VIC 3000

Our Ref: 23898P

21st October 2024

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

Dear Sir/Madam;

LANDOWNER SUBMISSION: CROSKELL EMPLOYMENT PSP

1660 THOMPSONS ROAD, CRANBOURNE EAST VIC 3977 (PARCELS 13E & 13R)
37 BROCKER STREET, CLYDE NORTH VIC 3978 (PARCELS 20 & 22)
3 BALLYMENA CRESCENT, CRANBOURNE EAST VIC 3977 (PARCEL 26)
LOT 10 ON PS729806, LOT 1 ON PS706792 & LOT C ON PS704181

We refer to the above matter and write on behalf of the landowner to make a submission regarding the draft Amendment C296case and the Croskell Employment Precinct Structure Plan currently being exhibited.

The following tables provide a summary of the land holdings of our client.

PSP Parcel ID:	13E & 13R
Land Address:	1660 Thompsons Road, Cranbourne East 3977
Registered Proprietor:	Fouz Superannuation Pty Ltd
SPI:	10/PS729806P
Site Area:	41.08 ha
Proposed Land Use designation[^]:	<p><u>Parcel 13E – 39.48ha</u> Waterway and Drainage Reserve – 8.79ha Utilities Easement – 10.59ha Arterial Road – Widening/Intersection flaring (ICP land) – 0.64ha NDA Employment – 19.46ha</p> <p><u>Parcel 13R – 1.58ha</u> Local Network Park (ICP Land) – 0.65ha Waterway and Drainage Reserve – 0.66ha Local Sports Reserve Credited (ICP land) – 0.08ha NDA Residential – 0.19ha</p>
Constraints:	<p>Powerline Easement for the purpose of transmission of electricity. Water supply easement. Water supply and rights in connection therewith set out in AA1372. Victorian Desalination Pipeline (VPD) power cable. Plan 8 - Native vegetation that may be removed</p>

[^] - Areas obtained from Table 23 (Parcel-specific land use budget) in exhibited Croskell Employment PSP

PSP Parcel ID:	20
Land Address:	37 Brocker Street, Clyde North 3978
Registered Proprietor:	Yusuf Property Pty Ltd
SPI:	1/PS706792C (part)
Site Area:	11.84 ha
Proposed Land Use designation[^]:	Parcel 20 – 11.84ha Waterway and Drainage Reserve – 1.36ha Local Network Park (ICP Land) – 1.54ha Aboriginal Heritage – 5.40ha NDA – Residential – 3.54ha
Constraints:	Plan 8 - Native vegetation that may be removed Plan 8 - Native vegetation that should be retained Plan 8 – scattered trees that should be retained (MSA) Waterway Intangible Cultural Heritage Values

[^] - Areas obtained from Table 23 (Parcel-specific land use budget) in exhibited Croskell Employment PSP

PSP Parcel ID:	22
Land Address:	37 Brocker Street, Clyde North 3978
Registered Proprietor:	Yusuf Property Pty Ltd
SPI:	1/PS706792C (part)
Site Area:	3.236 ha
Proposed Land Use designation[^]:	Parcel 22 – 3.23ha NDA – Residential – 3.23ha
Constraints:	Drainage easements as per title. Plan 8 – Native trees that should be retained (Arborist).

[^] - Areas obtained from Table 23 (Parcel-specific land use budget) in exhibited Croskell Employment PSP

PSP Parcel ID:	26
Land Address:	3 Ballymena Crescent, Cranbourne East 3977
Registered Proprietor:	Fouz Investments Pty Ltd
SPI:	C/PS704181U
Site Area:	4.615 ha
Proposed Land Use designation[^]:	Parcel 26 – 4.01ha Waterway and Drainage Reserve – 2.31ha NDA – Residential – 1.70ha
Constraints:	Plan 8 - Native vegetation that may be removed Waterway

[^] - Areas obtained from Table 23 (Parcel-specific land use budget) in exhibited Croskell Employment PSP

Submission to exhibited 1051 Croskell (Employment) Precinct Structure Plan (September 2024)

Please refer to the enclosed **Attachment A: Table 1: Reeds Planning Review** for specific requests to amend the exhibited PSP.

Please also refer to the enclosed **Attachment B: Concept Plan**.

In addition to the submission in the enclosed Attachments, we provide below property specific responses:

Parcel 13E

- i) The portion of land identified as “commercial/office” fronting Thompsons Road is very shallow and given this site’s narrow frontage (constrained by the waterway), it makes it challenging to achieve the *Planned Character Outcomes* identified in **Table 9** and secure tenants for viable long term uses. We request that the land identified for commercial/office be permitted to be enlarged (if required) by agreement with council to facilitate a feasible design outcome. While our client is not wanting to increase the office/commercial space per se, should an operator require a slightly larger site adjoining Thompsons Road, then the PSP should include wording that allows for flexibility in the land use designation.

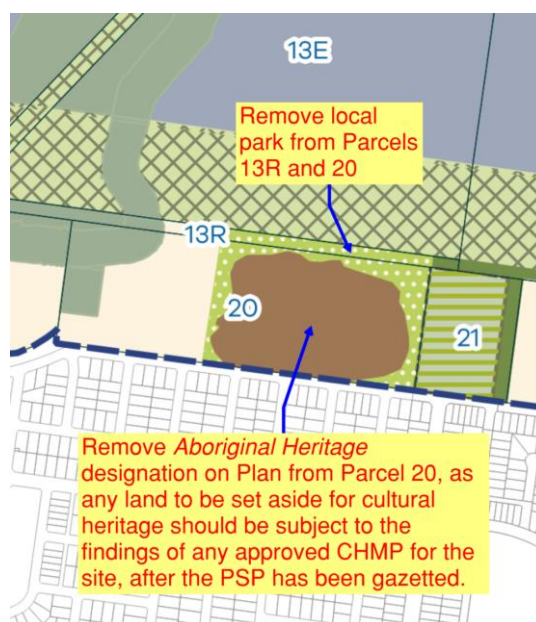
Furthermore, the distinction between “commercial/office” and “business” is unclear particularly as:

- The same zone is proposed for both;
- There is no land use in the planning scheme for either “commercial/office” and “business”.

We consider that it would be prudent of the VPA to clarify these uses and ensure that any definitions are in keeping with the Land Use Terms (Clause 73.03) to avoid potential differences of opinion/interpretation at the planning permit application stage.

Parcel 20

- i) **Plan 13 – Land Use Budget.** In addition to the comments made in Table 1 (**Attachment 1**), we provide below a mark-up demonstrating our client’s request to remove the Aboriginal Heritage and local park from Parcel 20 and have the local park also removed from Parcel 13R.

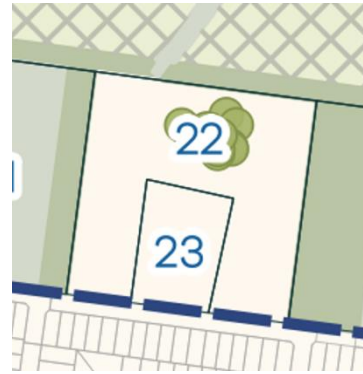


Parcel 22

- i) The MSA Levy Estimator¹ depicts a single scattered tree in the north (central) of the site that can be offset under the Biodiversity Conservation Strategy. **Plan 8 Native Vegetation Retention and Removal Plan** in the PSP identifies a much larger patch of trees as “native trees that should be retained”, which is inconsistent with the Commonwealth review, hence Plan 8 must be updated to remove reference to the retention of vegetation on site. The retention of this patch of trees poses a significant constraint on an already restricted site given the U-shaped parcel and the need to provide regular-shaped allotments and standard road widths.



MSA Map

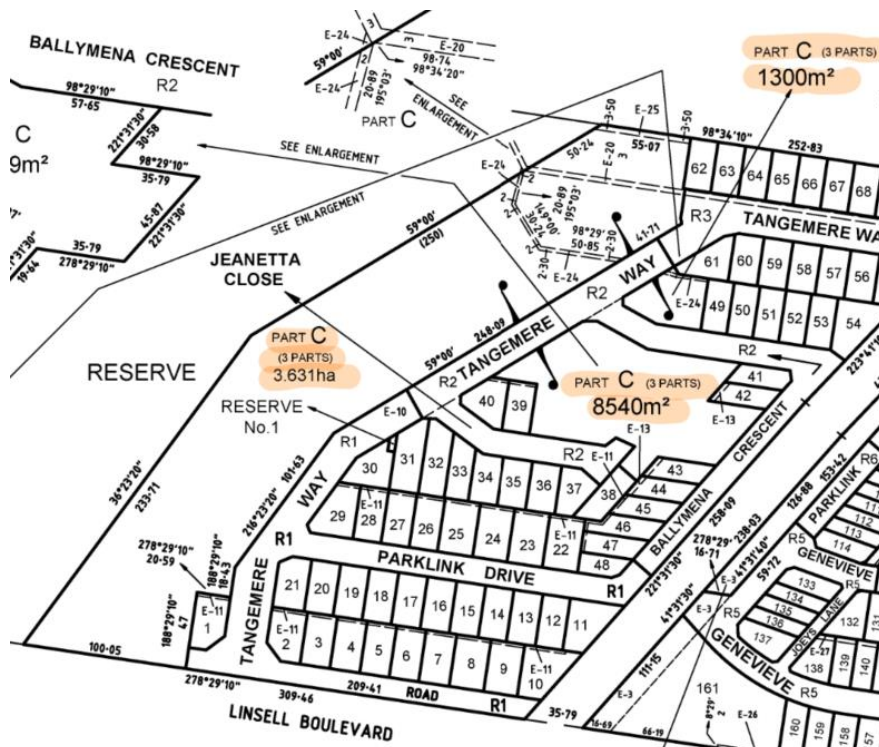


Plan 8 - PSP

As a fallback position, should the vegetation deemed to be of significance and must be retained, then the proponent requests that any land set aside for open space be credited open space.

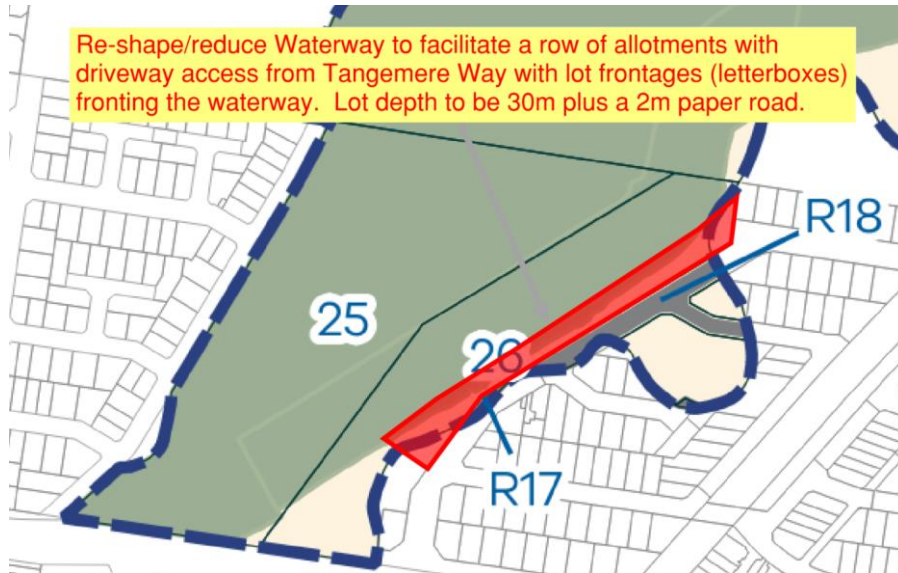
Parcel 26

- i) The PSP identifies this parcel in **Table 23** as having an area of 4.01ha. The title area is 4.615ha, therefore the PSP table must be updated to the correct land area. For clarity, the title is comprised of three parcels (Lot C on PS704181U), being 3.631ha, 0.854ha and 0.130ha, for a total area of 4.615ha.

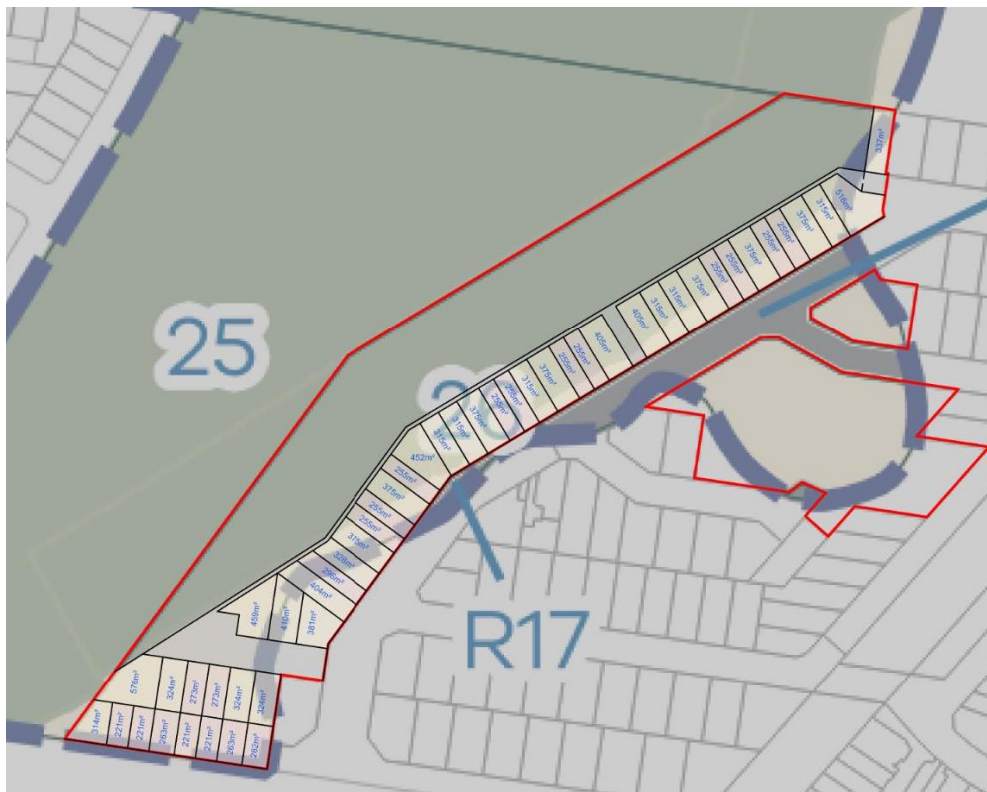


¹ Source: <https://mapshare.vic.gov.au/msa/map/>

- ii) **Plan 13 Land Use Budget.** The PSP proposes to create an irregularly shaped waterway on this parcel, which comprises the ability to deliver the 1.70ha of residential NDA. Accordingly, it is requested that the waterway is re-aligned or reduced to create a strip of land of minimum 32 metres (to allow for 30m deep allotments and a 2m paper road), as per the below mark up. The area highlighted in red should be identified as being unencumbered.



Reeds Consulting have prepared an indicative layout plan for Parcel 26 (western side of Tangemere Way) and provide an extract below. This plan creates 30m allotments adjoined by a 2m paper road and also includes a pedestrian walkway to break up the allotments and provide access to the drainage reserve. We consider that the below plan would result in a high-quality urban design outcome as the lots would front the drainage reserve and provide passive surveillance, while also having a secondary frontage to Tangemere Way which would include vehicle access.



We request that the VPA and Melbourne Water consider this request and amend the drainage scheme to facilitate useable land on Parcel 26, as the current drainage reserve alignment results in the creation of unusable developable land.

The exhibited PSP references the need for an “active frontage” where the subdivision/development interfaces existing development. Given the constraints in terms of the area and shape of Parcel 26, this “active frontage” cannot be achieved. As such, the PSP requires amendment to allow for discretion to be applied and dispensations sought from having to meet this requirement.

Drainage Submission

With reference to the draft Croskell PSP / Melbourne Water Development Services Scheme proposals, while we generally support the proposed DSS in overview, we seek to raise for review with VPA and Melbourne Water several changes to some elements of the proposed DSS relating to our client’s properties.

The proposed changes that we seek to review in consultation with Melbourne Water and VPA are outlined in our attached Drainage Concept Mark Up Plan ref: SK01 A.

We consider that the proposed changes will not cause major impacts on the proposed DSS, they are in keeping with the DSS objectives and will provide more efficient use of proposed developable land and of the proposed drainage scheme works.

The recommended changes are labelled on the Concept Plan in red as Item 1 through to Item 5, comprising of:

- Item 1: Reduction of WL2 buffer area in parcel 13E
- Item 2: Realignment of waterway and road culvert crossing in parcel 13E
- Item 3: Realignment of waterway elbow bend in parcels 13E, 13R, 20 and 19 (subject to the relocation of local poles on Ausnet southern HV line (not HV transmission lines)).
- Item 4: Relocation of SB2 sediment basin based on Item 3 realignment
- Item 5: Adjustment of waterway alignment /width in parcel 26, to enable a line of lots to be planned on the west side of Tangemere Way in the 3 Ballymena Cr property, as previously proposed in the owner’s rezoning application which was under review prior to the introduction of Croskell PSP.

The plan also highlights other issues including major service crossings/ service impacts required by the draft PSP drainage proposal and areas where we seek clarification from VPA for elements of the draft PSP drainage proposal that impact the client’s properties.

Further details regarding the above drainage proposals will be provided to VPA/MW following their initial review and discussions.

If you have any queries regarding this submission, please contact the undersigned.

Yours faithfully,
for REEDS CONSULTING PTY LTD

SARAH NORTH
Planning Manager