

Submission to

Casey Fields South Employment & Devon Meadows PSP, DSS & Amendment C295case

10, 24 & 70 Clyde – Five Ways Road and 45 Manks Road, Clyde

Client
Pask

Issued
31 March 2025



Introduction

Beveridge Williams makes this submission to the Casey Fields South Employment and Devon Meadows Precinct Structure Plans (CFS&DM PSP), the Casey Fields South Employment and Devon Meadows Development Services Scheme (CFS&DM DSS) and Planning Scheme Amendment C295case on behalf of Pask who have an agreement with the current landowners to develop the properties at 10 & 70 Clyde – Five Ways Road and 45 Manks Road, Clyde following the gazettal of the future Clyde South PSP.

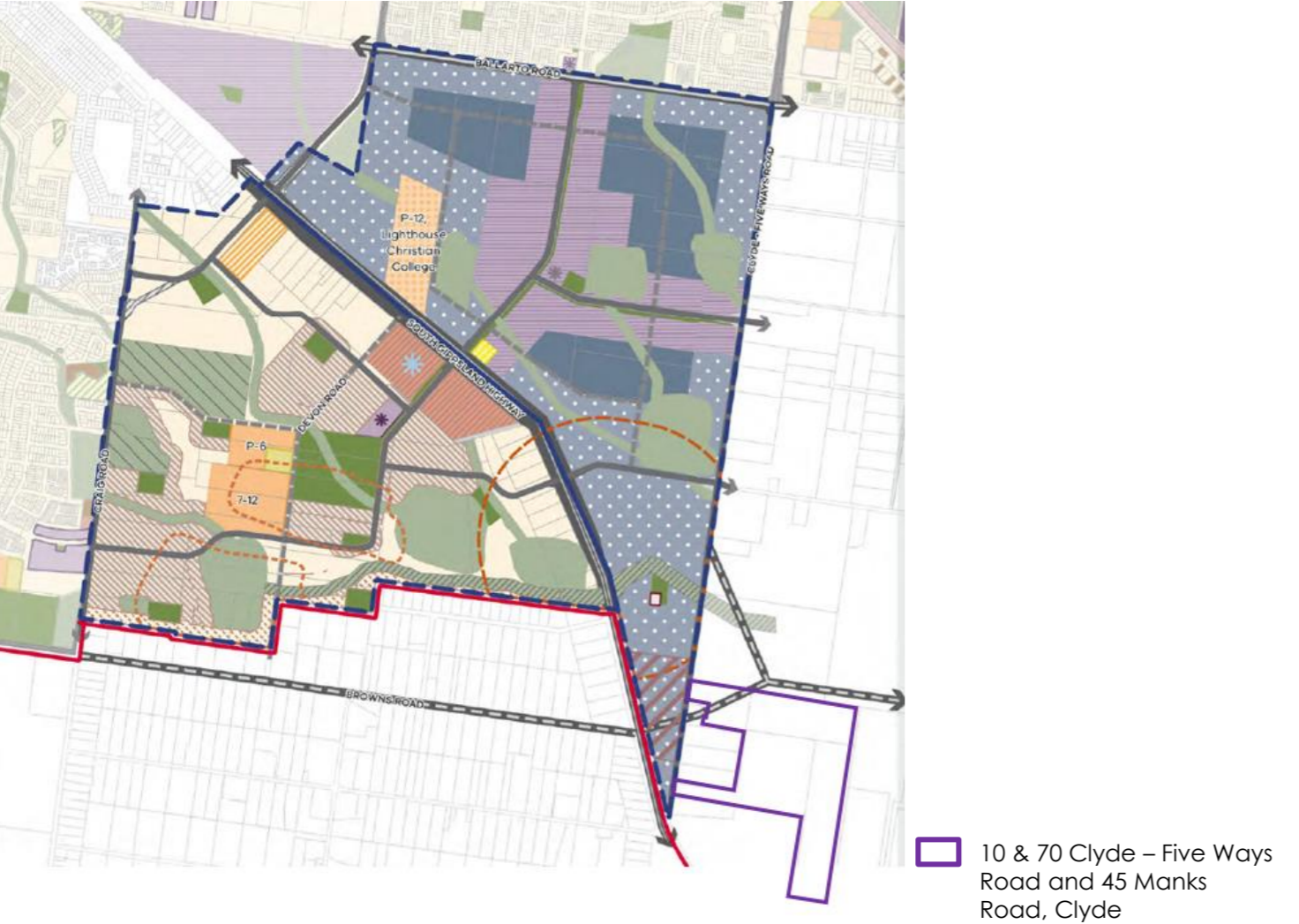
The subject land is located within the Clyde South PSP which the State Government's 10-year Greenfields Plan identifies as a Horizon 2 project (to commence between 2025/26 and 2028/29, with completion by 2033). The VPA has recently completed the Due Diligence Threshold Assessment for Clyde South PSP and has formally submitted their recommendation to the Minister for Planning to progress the PSP from Due Diligence to PSP Preparation Stage. It is understood that the VPA is awaiting the Minister's approval to commence the PSP.

Our client makes this submission because whilst the subject land is located within a neighbouring PSP, the CFS&DM PSP and DSS propose land use outcomes that will directly impact the existing land uses and potential development opportunities in the future. Specifically, these documents propose to apply the Public Acquisition Overlay Schedule 4 (PAO4) to the land located immediately north of the subject site to facilitate a proposed diversion waterway. The diversion waterway will then discharge flows from the CFS&DM PSP into the existing channel that runs through the eastern extent of that site. Significantly, the same existing waterway extends from 90 Clyde – Five Ways Road into our clients land, and specifically through, 10 Clyde -Five Ways and also 45 Manks Road.

The CFS&DM PSP also illustrates an inductive future road network across the subject land despite the land not forming part of the CFS&DM PSP.

Based on a review of the CFS&DM PSP, DSS and Amendment documentation, our Pask **strongly objects to the draft CFS&DM PSP and the CFS&DM DSS as it applies to Clyde South and the subject land.**

Figure 1: Extract from PSP Plan 2: Place Based Plan (VPA 2025)



Subject Site and Surrounds

The study area comprises four sites that are addressed 10, 24 and 70 Clyde Fiveways Road and 45 Manks Road, Clyde, which are within the future Clyde South Precinct Structure Plan (PSP) area, which is currently at pre-commencement.

The property located at 10 Clyde Fiveways Road in Clyde consists of three cadastral allotments and is a large landholding. It features a single dwelling accompanied by outbuildings related to agricultural activities. The remaining allotments do not have any structures and are primarily used for intensive agriculture, which includes crop cultivation and the maintenance of three large dams. Two watercourses run through the site from north to south. The total area of the property is 18.08 hectares, with vegetation primarily restricted to the perimeters of the site. Access is currently available from Clyde Fiveways Road via an unmade crossover.

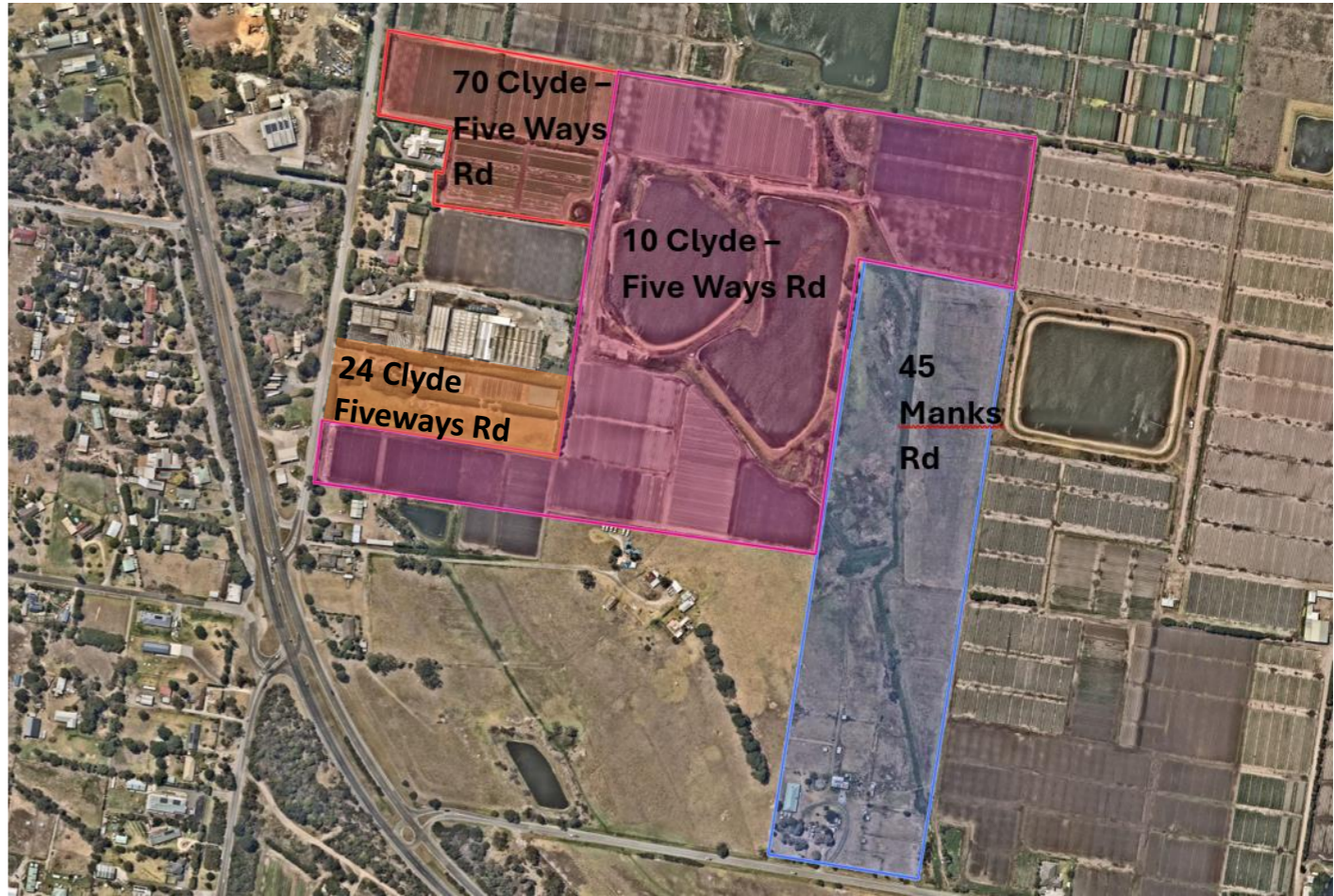
The site at 70 Clyde Fiveways Road is irregularly shaped, with a frontage of 89 meters along Clyde Fiveways Road and a depth ranging from 175 to 252 meters. This site covers an area of 3.73 hectares and has vegetation along the edges of crop arrangements. It is devoid of any structures and is used for agricultural purposes, specifically for crop arrangements.

Additionally, the property at 45 Manks Road is rectangular, with a frontage of 164.1 metres and a depth of 646 metres. It consists of a single dwelling and associated outbuildings, covering an area of 10.35 hectares. The vegetation is mostly limited to the dwelling and surrounding structures. A watercourse also runs through this site from north to south. Access is available from Manks Road via an unmade crossover.

The sites are located within the western extent of the future Clyde South Precinct Structure Plan area. The PSP spans an area of 1057ha, bounded by Ballarto Road to the north, farming properties to the east, Manks Road to the south, the South Gippsland Highway to the southwest and Clyde Fiveways Road to the west. The precinct will complement existing surrounding developments through the provision of residential and commercial development opportunities.

The adjoining land is also subject to the pending Clyde South PSP, which is land used for rural and agricultural purposes that will eventually transition to urban uses once the PSP is gazetted. Land further to the west is subject to the future Devon Meadows PSP & Casey Fields South Employment PSP.

Figure 2: Site Context Aerial (NearMap 2025)



Property Details				
Address	10 Clyde-Fiveways Road Clyde		70 Clyde-Fiveways Road Clyde	45 Manks Road Clyde
Formal Description	Lot 1 on TP889000	Lots 1 & 2 PS328060	Lot 2 PS802754	Lot 1 TP125991
Municipality	City of Casey			
Site Area	18.08ha		3.73ha	10.35ha
Zone	Urban Growth Zone (UGZ) Urban Floodway Zone (UFZ)		Urban Growth Zone (UGZ)	Urban Growth Zone (UGZ) Urban Floodway Zone (UFZ)
Overlay	Public Acquisition Overlay – Schedule 1 (PAO1) Land Subject to Inundation Overlay (LSIO)		Public Acquisition Overlay – Schedule 1 (PAO1)	Land Subject to Inundation Overlay (LSIO)
Area of Aboriginal Cultural Heritage Sensitivity	Yes		Yes	No
Bushfire Prone Area	Yes		Yes	Yes
Melbourne Strategic Assessment Area	Yes		Yes	Yes

Title Details

10 Clyde Fiveways Road comprises multiple parcels formally known as Lot 1 on TP889000 and Lots 1 and 2 PS328060. There are two drainage easements present on Lots 1 and 2 PS328060 which runs across both sites. A Caveats is registered on both titles to restrict the sale of the property without the written consent of interested parties.

70 Clyde Fiveways Road is formally known as Lot 2 PS802754. Two drainage easements are present on site, running parallel with the eastern, southern, and part of the western boundaries. A Caveat is registered on title to restrict the sale of the property without the written consent of interested parties.

45 Manks Road is formally known as Lot 1 TP125991. An easement is present on site and traverses the site.

Section 45 notices are registered to the Certificate of Titles, which relates to the application of the Melbourne Strategic Assessment Area. Section 201UBs are also registered on the Certificate of Titles and relate to GAIC liability.

Figure 3: Title Plan Extract – Lot 1 & 2 PS328060

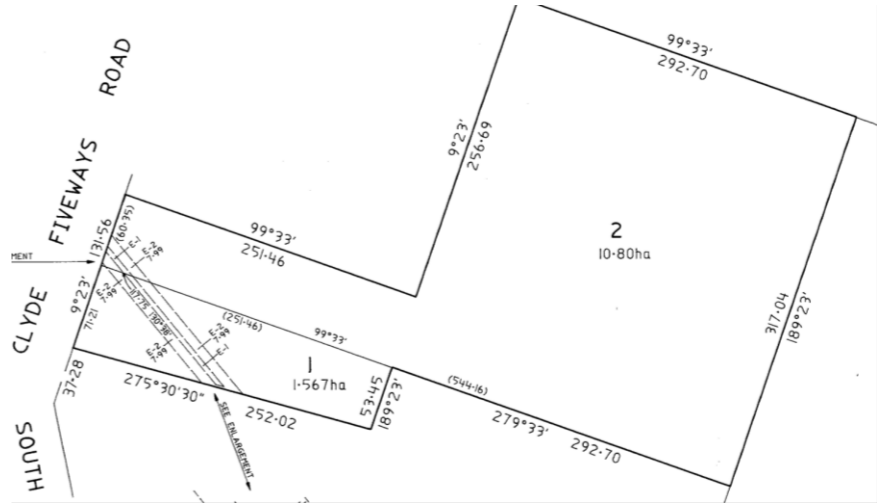


Figure 4: Title Plan Extract Lot 1 TP125991

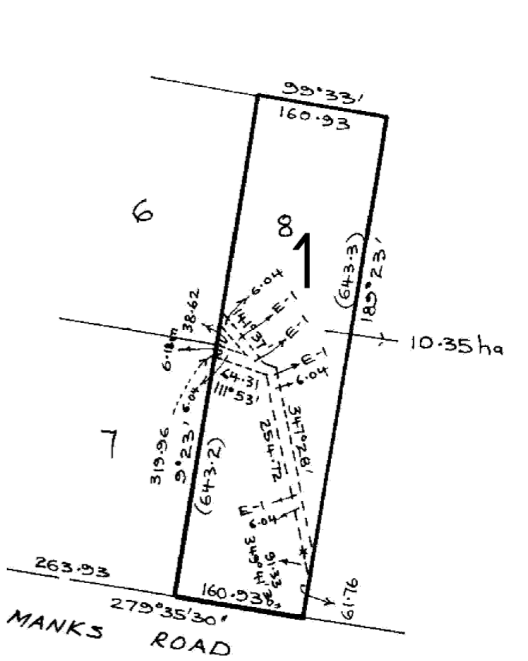


Figure 5: Title Plan Extract – Lot 1 TP889000

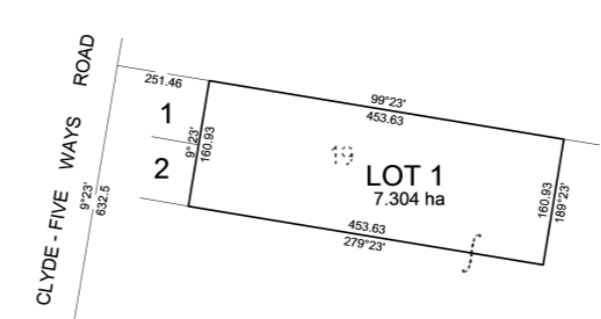
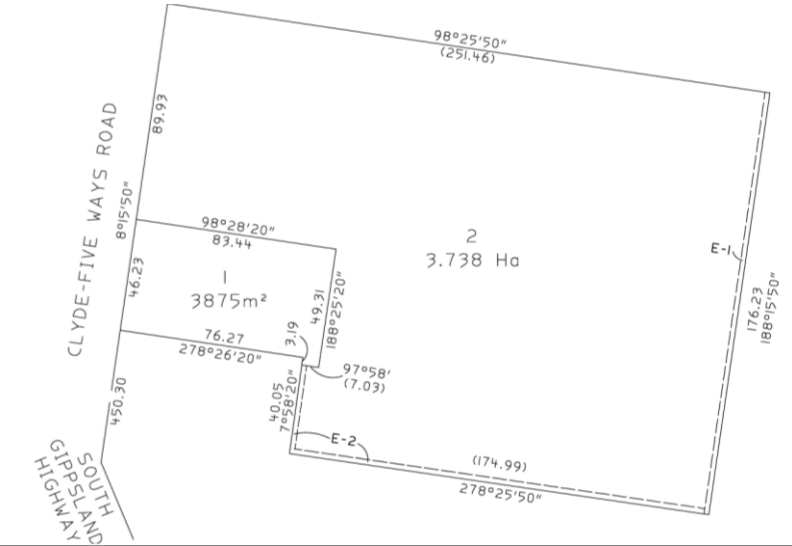


Figure : Title Plan Extract – Lot 2 PS802754



Existing Planning Controls

The subject land is located within the City of Casey and is subject to the provisions of the Casey Planning Scheme.

The sites are zoned Urban Growth Zone (UGZ), and as the Clyde South PSP is yet to be prepared, no schedule currently applies. The Urban Floodway Zone also applies to 10 Clyde – Five Ways Road and 45 Manks Road. Both properties are also affected by the Land Subject to Inundation Overlay (LSIO). The Public Acquisition Overlay – Schedule 1 applies to the western edge of 10 and 70 Clyde Five-Ways Road to facilitate the future widening of the road to an arterial standard

Clause 37.07 Urban Growth Zone

The site is subject to the Urban Growth Zone (UGZ). The purpose of the Urban Growth Zone is:

- To manage the transition of non-urban land into urban land in accordance with a precinct structure plan.
- To provide for a range of uses and the development of land generally in accordance with a precinct structure plan.
- To contain urban use and development to areas identified for urban development in a precinct structure plan.
- To provide for the continued non-urban use of the land until urban development in accordance with a precinct structure plan occurs.
- To ensure that, before a precinct structure plan is applied, the use and development of land does not prejudice the future urban use and development of the land.

Under the provisions of the UGZ, Part A applies to the land since the Clyde South PSP has not yet been prepared. Part A generally restricts the subdivision and development of the land until a Schedule that implements the outcomes of the Clyde South PSP is incorporated into the Casey Planning Scheme. In the interim, the planning controls support the continued use of land for agriculture.

Clause 37.03 Urban Floodway Zone

The Urban Floodway Zone (UFZ) applies to the northeastern extents of 10 Clyde Fiveways Road & 45 Manks Road (approximately 1.48ha & 2.64ha respectively). The UFZ applies to regions with the greatest risk and frequency of flooding. The zone aims to: ensure that the development of land allows the passage and storage of floodwater; minimises flood damage to property; recognises flooding as a hazard; and responds to local drainage conditions. Additionally, the zone intends to improve environmental quality as well as minimise soil erosion, sedimentation, and silting.

Under the UFZ, a dwelling is a 'Section 3 – Prohibited' use meaning that a permit cannot be granted to use this portion of the site for housing.

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Within the UFZ, a permit is required for land subdivision. Subdivision is only allowed if the number of lots does not increase, unless a local floodplain development plan incorporated into the scheme permits otherwise. Additionally, a subdivision may be approved if it creates a lot that, by agreement between the landowner and the relevant floodplain management authority, is to be transferred to an authority for a public purpose.

Clause 44.04 Land Subject to Inundation Overlay

The LSIO partially applies to parts of 10 Clyde – Five Ways Road and 45 Manks Road. Under Clause 44.04-2, planning approval is required for any future development or subdivision on the site. The application will be referred to Melbourne Water to address flooding and inundation concerns. This typically means that finished floor levels must be set above a certain height, and basement ramps may need to be designed with specific gradients to minimize flood risks.

Clause 45.01 Public Acquisition Overlay Schedule 1 (PAO1)

The Public Acquisition Overlay – Schedule 1 (PAO1) applies to the western boundary of 10 and 70 Clyde Five Ways Road, reserving the land for the Head, Transport for Victoria. This is for the future widening of Clyde-Five Ways Road to an arterial standard. The adjacent Clyde Creek PSP to the north plans for Clyde-Five Ways Road to continue south as a 41m wide, 6-lane primary arterial road, and this configuration is expected to be included in the future Clyde South PSP.

Figure 7: Existing UGZ & UFZ (Source: VicPlan)

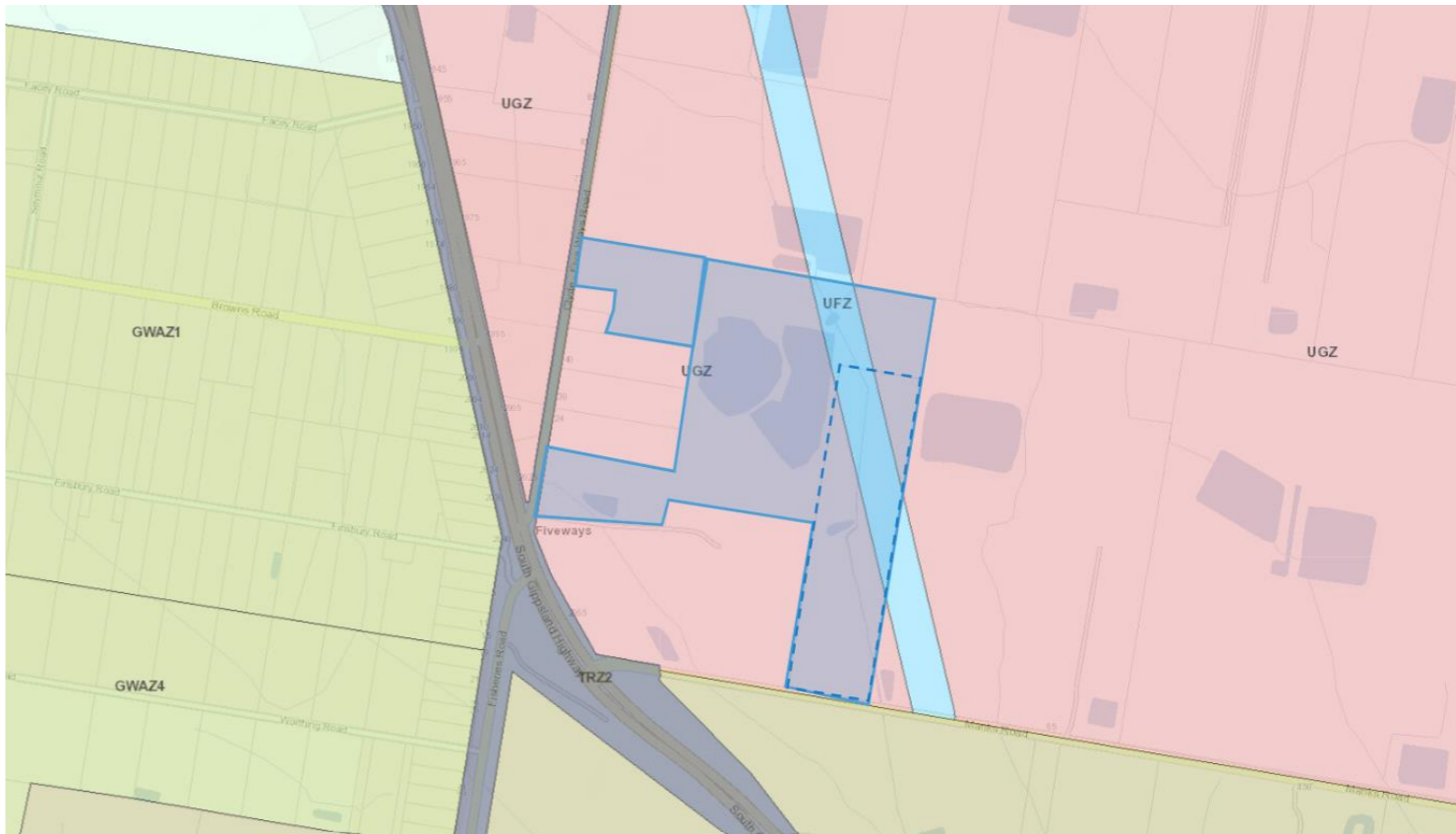
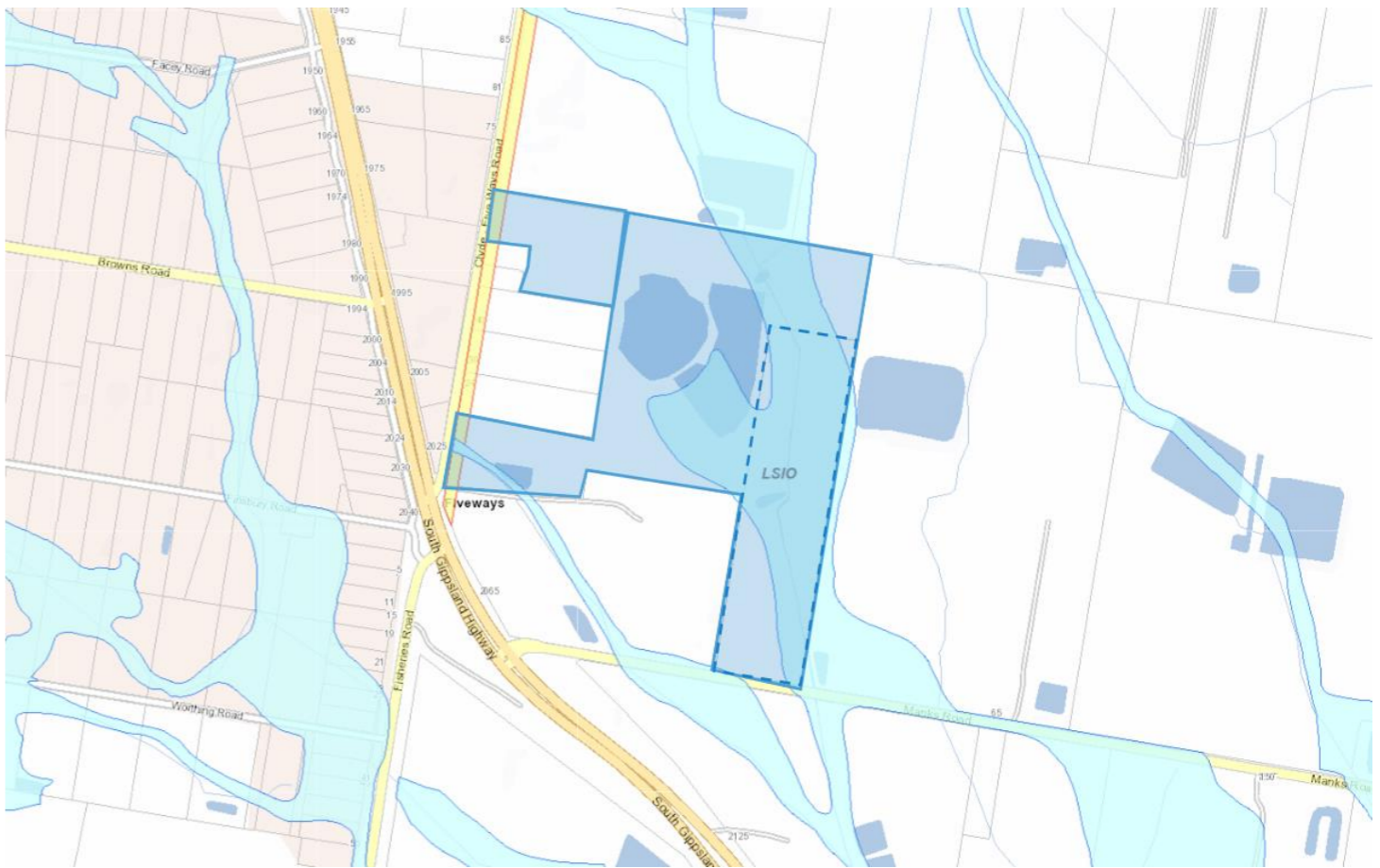


Figure 8: Existing PAO1 & LSIO (Source: VicPlan)



Draft Casey Fields South (Employment) and Devon Meadows PSP & Proposed Planning Controls

Casey Fields South and Devon Meadows Precinct Structure Plan (CFS&DM PSP)

The draft Casey Fields South (Employment) and Devon Meadows PSP combines a residential precinct and an employment precinct into a single Precinct Structure Plan. The precincts are relatively small in comparison to the adjoining Clyde South PSP being 275Ha and 216Ha respectively. Both precincts are distinct in character and physically separated by the established road network.

The future Clyde South PSP forms the shared boundary with the Casey Fields South (Employment) Precinct which the CFS&DM PSP envisages as a flexible, next-generation employment precinct, expected to create around 5,370 jobs. The urban structure is designed to be robust and adaptable, supporting a diverse mix of industries and businesses to foster growth and innovation.

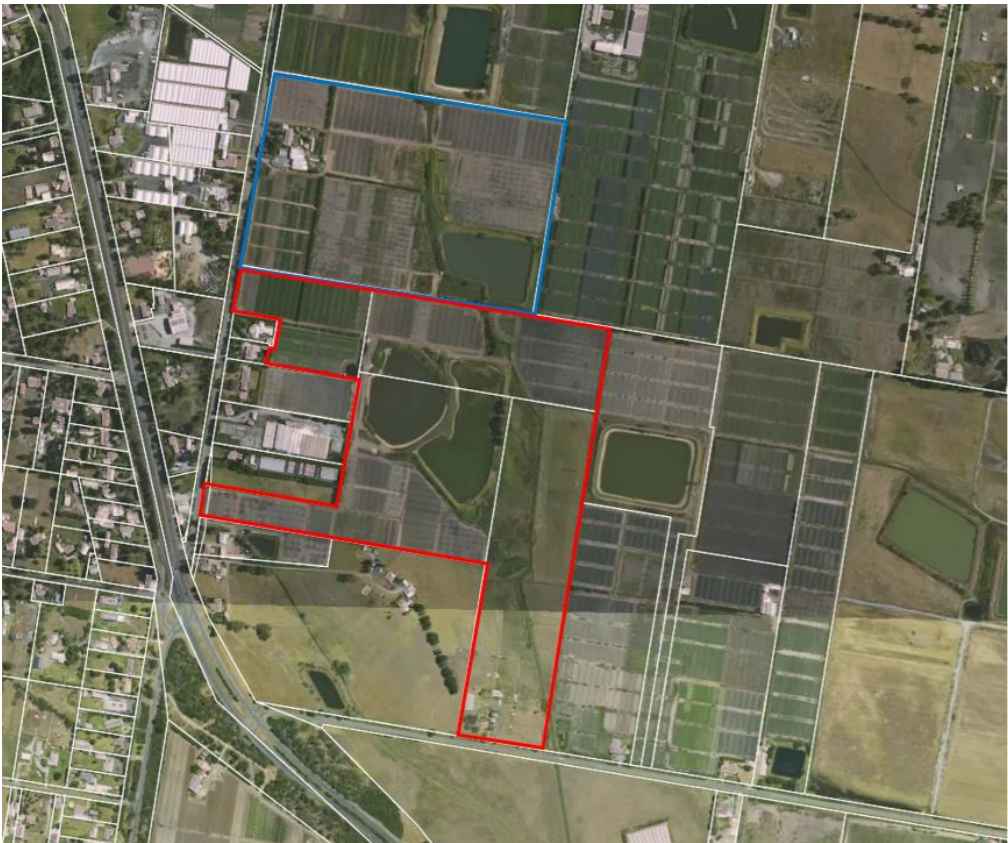
As a residential precinct Devon Meadows 'will be an immersive and walkable residential community that is home to just over 11,000 residents in a seamless blend of modern urban living and natural landscape character'.

The subject site is located within the Clyde South PSP, adjacent to the CFS&DM PSP and immediately south of 90 Clyde – Five Ways Road which is earmarked to accommodate a proposed diversion waterway. The CFS&DM PSP proposes to apply the Public Acquisition Overlay – Schedule 4 (PAO-4) to 90 Clyde Five-Ways Road to enable the construction of a waterway and a legal point of discharge into the existing channel that runs through the eastern extent of that site. Significantly, the same existing waterway extends from 90 Clyde – Five Ways Road into 10 Clyde –Five Ways and also 45 Marks Road.

In addition to the above, the CFS&DM PSP illustrates an inductive future road network across the subject land.

It is submitted that the draft CFS&DM PSP and DSS is significantly influencing the future land use outcomes and development potential of the land within the Clyde South PSP before the PSP has even commenced preparation. Furthermore, there has been little to no analysis conducted to address the potential negative impacts on the existing business operations and the future development potential of the subject land as a consequence of the proposed drainage scheme. **Pask therefore strongly objects to the draft CFS&DM PSP and the CFS&DM DSS in relation to the subject land.**

Figure 9: Proposed PAO4 (Source: Exhibited Amendment C295case)



- 10 & 70 Clyde – Five Ways Road and 45 Marks Road,
- 90 Clyde – Five Ways Road

Public Acquisition Overlay – Schedule 4

The CFS&DM PSP and DSS propose a 40m wide Public Acquisition Overlay over 90 Clyde – Five Ways Road which sits to the immediate north of the subject land. The CFSPSP and DSS notes that the PAO4 is required to facilitate the development of the precincts and to improve what Melbourne Water has described as 'legacy issues' associated with the Devon Meadows rural residencies located beyond the Urban Growth Boundary.

As a property located immediately downstream of the diversion waterway, it is submitted that our client's land will be significantly impacted. Notably, the Preliminary Drainage Investigations undertaken by Beveridge Williams indicate that the proposed drainage solution could increase flows passing through Clyde Five Ways Rd into the Clyde South PSP area by up to 100%.

To date, there has been no analysis to manage increased flows through Clyde South. Accordingly, **Pask strongly objects to the application of PAO-4 and the diversion waterway across the neighbouring site at 90 Clyde – Five Ways Road**

Staging

CFS&DM PSP Plan 9 – Infrastructure and Development Staging identifies the purchase of land and the construction of the proposed diversion waterway as a Stage 1 priority. The staging plan prevents any development within either precinct from commencing until this infrastructure has been delivered.

Of great concern to our client is that the current agricultural operations will continue on site until the land receives planning permit approval for subdivision and development in line with the future Clyde South PSP. The existing business has no intention of reducing or closing operations before this approval is granted. Therefore, the existing land use does not trigger a needs for any upgrades to the existing channel that runs through the site to support current operations.

Pask raise concerns about how Melbourne Water and the VPA plan to manage the significant increase in water flow through the subject and prior to the completion of a drainage scheme for the subject land and the Clyde South PSP. The staging plan, CFS&DM PSP, and DSS do not adequately recognize the extent of work required for the existing waterways within Clyde South. It is noted that indicative drainage modelling could result in a 100% increase in flows compared to current conditions.

Similarly, the resolution of increased flow further downstream and beyond the UGB remains unresolved under the draft DSS.

Due to the lack of resolution associated with drainage downstream of the proposed diversion waterway in addition to the nonchalant approach to the impacts it will inevitably have on the development potential of Clyde South, Pask strongly objects to any increase in flows into the site to facilitate the development of the adjoining precinct as per the draft CFS&DM DSS and PSP.

Preliminary Drainage Investigations

To understand the potential implications to the subject land, Beveridge William's drainage engineers have reviewed the draft CFS&DM DSS and attended the four DSS engagement sessions hosted by the VPA and Melbourne Water. The engineers have also met directly with Melbourne Water to discuss the draft CFS&DM DSS.

During the engagement sessions, concerns have been identified by Beveridge Williams and other parties in relation to:

- The diversion channel proposed to direct flows across catchments from Devon Meadows to the future Clyde South PSP via the Casey Fields South PSP.
- Presence of significant unknowns such as impacts to Clyde South PSP and downstream agricultural land.
- Staging of the proposed development, especially focused on the absence of downstream waterways to accept flows.
- The amount of land proposed to be used for waterways, retarding basins and wetlands.
- The lack of alignment with other planning objectives such as efficient urban form.

Appendix A to this submission contains a memorandum that details Beveridge Williams' preliminary investigations and includes:

- High level review of planning and objectives.
- High level review of site context.
- Review of GHD's current proposal
- Outlining alternative ideas to manage stormwater through the subject land.

Drainage Considerations

The study area relating to the drainage memorandum includes the Casey Fields South (Employment) & Devon Meadows PSPs and the neighbouring Clyde South PSP which has not yet commenced. The PSP areas interact with 8 Melbourne Water Drainage Services Schemes (DSS) which identified as:

- Devon Meadows DSS (2362) – Under preparation in conjunction with PSP.
- Clyde Five Ways Rd DSS (2367) – Under preparation in conjunction with PSP.
- Moore Rd DSS (2368) - Under preparation in conjunction with PSP.
- Clyde Township DSS (2373) – To be developed with Clyde South PSP; Downstream of Casey Fields South PSP.
- Botanic Ridge DSS (2352) – In progress; located upstream of and drains into Devon Meadows.
- Junction Village North DSS (2365) – In progress; located upstream of and drains into Junction Village South.
- Junction Village South DSS (2363) – Not yet commenced construction; located upstream of and drains into Clyde Five Ways Rd DSS.
- Casey Fields South DSS (2364) – Completed; located upstream of and drains Moore Rd DSS.

There are 2 key areas downstream of the PSP's that are relevant to this assessment:

- Existing Devon Meadows to the south of the proposed Devon Meadows PSP.
- The existing green wedge area to the south and east of future Clyde South PSP that is used for agriculture.

The stormwater and flooding related controls for the PSPs are:

- Flood Control: ensure that flooding is appropriately managed through the PSP for the nominated design event. This requires appropriate capacity of assets with sufficient freeboard to surrounding properties and no detrimental impacts to adjacent (upstream and downstream) areas. It is noted that due to the release of ARR2019 version 4.2 and the latest climate change guidelines, design events are now required to account for climate change. Melbourne Water have not yet nominated a climate change projection required to select the design event.
- Peak Runoff Control: implement retarding basins and other measures to ensure that peak runoff during the design event does not exceed pre-development conditions where the DSS ends.
- Volume Control: implement measures to ensure that the overall volume of flows discharging from the site (including frequent events) does not significantly increase as a result of development.
- Water Quality Control: implement water sensitive design measures such constructed wetlands and sediment ponds to ensure that best practice water quality targets are achieved and receiving waters are protected from pollutants and excess nutrients.

Considerations for the drainage strategy include:

- Socially and economically sustainable: The proposed design needs to be as cost effective as possible so as to be affordable for the community to operate and maintain.
- Considerate of other planning requirements: The proposed design needs to be sensitive to other requirements such as environmental protection, habitat, heritage requirements, open space requirements, and efficient urban layout.
- Minimise earthworks requirements: Earthworks can be destructive, expensive and generate pollution and CO2 emissions. The proposed design should work closely with the natural terrain to minimise earthworks requirements for the scheme and surrounding urban areas.
- Implementable: The design should consider the means by which the scheme is staged and delivered. There should be a clear process by which the scheme can be delivered without overreliance on temporary assets, and assets should be located on properties where there is sufficient other development available to fund the scheme works.
- Groundwater management: The study area is known for high groundwater levels and will need careful design to avoid impact to the groundwater table.
- Opportunities for water reuse: The proposed scheme should identify opportunities to capture and reuse stormwater, especially in the context of the downstream agricultural areas.
- Melbourne Water wetland preferences: Verbal feedback from Melbourne Water is that their maintenance team have reported that small to medium sized wetlands are performing well and their large end of line wetlands are not. As such they would like to see several smaller wetlands rather than one large wetland. MW have also noted that they do not want wetlands to discharge to downstream wetlands and flows should aim to bypass instead.
- Amenity and public use: Where possible, scheme assets should be configured to provide value/amenity to the community in the form of public open space. They should also aim to integrate, where possible, remnant vegetation and habitat.

Melbourne Water draft DSS

The draft CFS&DM Development Services Scheme proposes:

- 4 basins (WLRB) for Devon Meadows and a further 4 basins on Casey Fields
- 8 new constructed waterways including the proposed diversion channel

The key component of the strategy is the diversion channel is to achieve the following:

- Divert flood flows away from downstream properties to solve flood capacity issues in existing Devon Meadows
- Prevent increase in volume of water to downstream properties in existing Devon Meadows

The strategy terminates at Clyde Five Ways Road with 3 assumed connection points to the downstream channel network. It is noted that the area included in the strategy does not represent the full Clyde Five Ways Rd DSS and Moore Rd DSS.

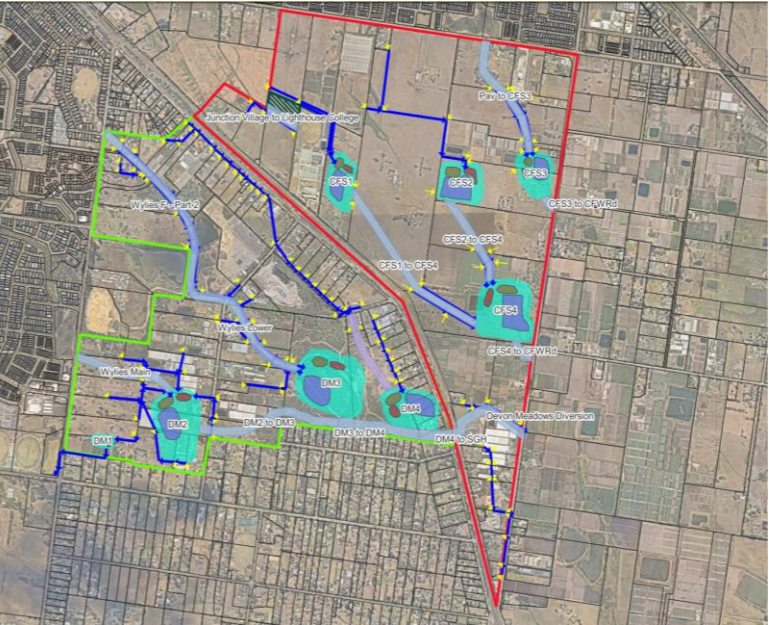


Figure 10: Preliminary Concept Drainage Strategy Plan (Source: Draft CFS&DM DSS - GHD 2024)

Concerns associated with current drainage proposal

The information below identifies the concerns associated with Melbourne Water's current drainage proposal as identified through preliminary drainage investigations undertaken by Beveridge Williams.

The Diversion Channel

The stated purpose of this channel was to protect downstream homes in Devon Meadows from flooding and excessive increases in volumetric discharge. While redirecting flows from Devon Meadows would protect these homes from the issues above, its not clear how it solves the issue. Rather it just relocates it as a problem for the landowners on Clyde South to manage until such time as they PSP/DSS can be developed and implemented. Even then, the issue will require additional assets or negotiation with downstream owners to resolve.

Supplementary discussions with MW have indicated that they have previously assessed flooding downstream and believe that these could be managed if flows are retarded to predevelopment at the boundary of the Devon Meadows DSS. It was noted that the only real flood concern related to the existing properties along Facey Rd.

In these discussions, MW have also noted that the volumetric concern was based of anecdotal evidence (customer complaints) and not modelling or analysis.

Preliminary analysis of the flooding and water balance conducted by Beveridge Williams indicates that these issues could potentially be managed through more typical measures including:

- Maintenance and minor capacity augmentation of the downstream channel, to potentially a 10m wide grassed channel which would require minimal property acquisition to achieve.
- Retarding basins to ensure pre-development flow rates at the boundary.
- Capture and retention of ~565 ML/y of flows in the basin and a diversion pipe in the order of 225mm to direct it to the farmland downstream for re-use.
- A more modest diversion between DM3 and DM4 before connecting to the existing Wylies Drain channel to protect homes along Facey Rd.

With regards to the actual implementability of the channel:

- Beveridge Williams has used the 1m LiDAR and levels summarised in GHDs report I an effort to understand how the channel works with the terrain and groundwater levels.
- Preliminary analysis indicates that the diversion channel requires significant cut to achieve the required levels, particularly between basins DM2 and DM3.
- **At its deepest, up to 10m of cut will be required** which with the proposed 1:5 batters could require a reserve width of up to 100m at its widest rather than the 40m proposed by the PAO. This would require a significant volume of earthworks to achieve which will incur significant cost.
- When compared with GHD's groundwater observations, **it appears that significant sections of the channel are proposed to be below the groundwater level** which raises several key issues:
 - If groundwater is allowed to enter the channel, then this is essentially a groundwater extraction and diversion system that will convey an unknown volume of groundwater into Clyde South.
 - If the channel is lined somehow to exclude groundwater, then this is a significant obstruction to the natural groundwater flow which may cause issues upstream. Its also not clear how this would affect downstream groundwater use (human or environmental).
 - Considering the size and scale of the works, the groundwater interaction will complicate the construction methodology further adding cost.
- The final consideration is that the outfall for this channel is still not negotiated and will require significant culvert upgrades under the South Gippsland Highway and Clyde Five Ways Road. There is also no channel for it to connect to downstream of Clyde Five Ways Road.

In summary, **the proposed channel appears to be a drastic and expensive measure directed at solving a problem that was not properly assessed/quantified.** It does not appear even resolve the perceived issue, instead just relocating it to a different location. It is strongly recommended that the diversion channel as proposed is abandoned and focus is placed on an alternate solution to protect homes in Devon Meadows.

Connection Points and Impact to Landowners in Clyde South

At this time, the proposed strategy relies on 3 connection points (shown in images below). These points are characterised by:

- Roads being only marginally above the surrounding floodplain.
- An absence of any major drainage features, which are at best a small drainage channel and culvert and at worst no drainage feature at all.

The following is unclear:

- How the proposed connections will work:
 - What will they connect to where no channel exists, will there be a requirement to extend the channel until an appropriate discharge point is reached?
 - Is it proposed to lower the channel or raise Clyde Five Ways Rd to construct sufficient culvert crossings?
 - How will these works impact the existing landowners.
- With current agricultural land uses occurring downstream, how will these properties manage additional flows from proposed upstream works, especially from increased volumetric discharge from Casey Fields (similar to the Devon Meadows issue) and both volumetric and flood flows from Devon Meadows relocated via the diversion drain.
 - Considering that the PSP has not commenced for Clyde South, implementation of any downstream management works could be years away.
 - Will interim basins on Casey Fields be implemented to manage these interim issues?
- Under the ultimate use, what works surplus to those required to meet Clyde South obligations will be required:
 - Additional retarding basin to ensure predevelopment flow rates at Manks Road (outfall from Clyde Five Ways DSS) is maintained?
 - Additional basin/storage to capture and reuse excess volumetric flow (assuming this cannot be shunted downstream onto the green wedge?)
 - Additional waterway reserve area to handle additional flows diverted from Devon Meadows which could be between an 8-15 cu.m/s if retarded to pre-development (current climate conditions), depending on timing of the peaks. **This could effectively increase flows passing through Clyde Five Ways Rd DSS in Clyde South PSP area by up to 100%.** Further modelling is required to confirm this.

PROPOSAL FOR AN ALTERNATIVE CONCEPT

Given the issues identified above, it is clear that there is a need for a rethink of significant components of the strategy. Beveridge Williams are currently undertaking additional modelling and concept design along the following lines to see if a more equitable solution can be found that addresses the above concerns:

- Removal of the diversion drain to be replaced with minor improvements to the existing channels downstream and including of a 225mm diversion drain for re-use.
- Redesign of the Devon Meadows basins to demonstrate that objectives can be met without the need to divert to Clyde South.
- Concept design of works downstream of Clyde Five Ways Rd to allow MW and the VPA to arrange a PAO to secure outfalls for Casey Fields.
- Additional concept design of a potential diversion drain around Lighthouse College.
- An examination of Casey Fields basins to determine if there is a more efficient/equitable distribution of assets.

As part of this assessment BW will be looking at potential footprints, concept level earthworks and cost comparison to demonstrate that the solution is an improvement over the current proposal. This work will form a detailed supplementary submission the CFS&DM PSP, DSS and Amendment C295case.

Ancillary implications resulting from the application of PAO-4 and future drainage works on the subject land.

Cultural Heritage Management Plan (CHMP)

A CHMP will likely be required to facilitate any upgrades to the existing waterways located downstream of the proposed diversion waterway. Upgrades are likely required to support the increased flows caused by the development of Casey Fields South and Devon Meadows.

It is submitted that the completion of a CHMP for all land within the Clyde South PSP, which is required to support the development of the CFS&DM PSP, must be funded through the CFS&DM DSS.

Melbourne Strategic Assessment (MSA)

MSA levy contributions are applicable to the subject land.

MSA payments are typically tied to a stage of subdivision and, under Section 35 of the Subdivision Act 1988, are payable by the acquiring authority. It is submitted that the proposed CFS&DM DSS, and by extension, the CFS&DM PSP, will likely burden our client's future development potential in order to facilitate the development of the adjoining PSP while also addressing 'legacy drainage issues' associated with land that, from a drainage perspective, remains completely unrelated to the Clyde South Precinct.

It is therefore submitted that the MSA levy, as it applies to all the land required to support the diversion waterway and the upgrading of existing waterways within the Clyde South PSP, must be funded through the CFS&DM DSS and not by our client.

Growth Area Infrastructure Levy (GAIC)

In a similar manner to the MSA, the GAIC Levy applies to the subject land. However, unlike the MSA, the person whose land is being acquired by the acquiring authority will generally be liable to pay the GAIC levy.

It is submitted the proposed PAO and necessary waterway upgrades are required to achieve a drainage solution that supports the development of Devon Meadows beyond what would have been required if the diversion was never proposed.

It is submitted that the GAIC payment associated with all land required to support the diversion waterway and by extension, the waterway upgrades within the Clyde South PSP must be funded through the CFS&DM DSS.

Existing Use Rights

A key concern that has been somewhat overlooked by the proposed CFS&DM PSP and DSS is the landowners' right to continue their current agricultural operations indefinitely, without disruption or prejudice.

Drainage investigations conducted by Beveridge Williams have identified that the increase in flows entering the site could increase by up to 100%. This significant increase will have a considerable impact on land parcels downstream of the proposed diversion waterway.

It is submitted that if Melbourne Water pursues the diversion waterway as currently proposed, the flows entering land downstream cannot be increased to a level that would impact the operation of the existing use. As previously detailed, the current operator intends to continue the agricultural use on the land until a planning permit is granted to subdivide and develop the site in accordance with the future Clyde South PSP.

Our client is concerned that there are significant unresolved issues regarding the management of flows and detention downstream of the diversion waterway. Specifically, it appears that no consideration has been given to the implications to the existing land uses and the potential loss of developable land due to the increased flows through Clyde South and the Pask land holdings. Accordingly, **Pask objects to any increases in flows entering their land until the drainage impacts downstream of the proposed PAO-4 are resolved.**

Westernport Green Wedge Management Plan (WPGWMP)

Informing any future drainage scheme for the broader area a consideration will need to be given to the existing agricultural uses and the Westernport Green Wedge Management Plan (WPGWMP) that applies to land located immediately south of the CFS&DM PSP and the Clyde South PSP.

A high level review of the WGWMP identifies the following:

- The land immediately adjoining the Clyde South UGB is identified as Type A – which is described as land that is predominately high in biophysical versatility (in the 80-100% range).
- Section 11.6 of the WGWMP notes the critical importance in the appropriate management of water within the Green Wedge. Specifically, the way water is used and managed being central to the success of the agricultural industry and to the enhancement of the internationally significant environment of Western Port Bay and its coastal hinterland.
- The City of Casey with Melbourne Water has prepared and adopted an Integrated Water Management Plan, which aims to create a Water Efficient City.
- Flooding and a range of other water management issues were identified through the Integrated Water Management Plan and it was concluded that they should be integrated with land use planning for the area. This concept was widely supported throughout public consultation.
- Key water management agencies (Melbourne Water, South East Water, Southern Rural Water, Port Phillip and Western Port Catchment Management Authority) are working together with the City of Casey and Cardinia Shire Council to improve water quality and food management to mitigate the impact of sedimentation and pollution on Western Port.
- The catchments of the Cardinia Creek, Dalmore Outfalls and the Bunyip/Tarago River will be the focus of a regional Integrated Water Management Plan, which will investigate water sensitive urban design opportunities and how to capture and treat storm water runoff to augment water supplies.
- Section 11.11 refers to the impact of urban development in proximity to the green wedge and includes a summary of independent expert reports that identify potential challenges. Specific to Water Management the report notes:
 - Increased development would impact all elements of the water cycle within the Green Wedge.
 - Development would have a negative impact on the natural flow regime of the Green Wedge's catchment.
 - Relatively minor increases in flood level would be expected due to development which could be managed, subject to agreement by Melbourne Water.
 - Runoff volumes and the frequency of flows would increase, however impact could be reduced through the use of water tanks for potable water and increasing the capacity of waterways to cater for more frequent flows and increased water volume - however the impact would not be eliminated.
 - Increasing capacity of waterways is unlikely to be feasible due to the impact on their ecological health.
 - Some mitigation of flooding and increased runoff could be achievable through: - maximising the use of rainwater tanks for potable water supply. - minimising direct hydraulic connections.
- Finally, Section 12 notes the Vision, Objectives, Strategies and Actions for the precincts within the WGWMP. Land immediately south of Manks Road is identified as Precinct 1. The Vision for the precinct is *'The Casey Agriculture and Horticulture Precinct will be the hub of agriculture within the Green Wedge, taking advantage of its highly versatile soils and excellent access to water. Land within the precinct will be prioritised for agricultural use, and opportunities for new, innovative or more intensive soil-based agriculture will be supported to ensure that the rich agricultural potential of the precinct is realised. Opportunities for linking the community with the local agricultural industry will be identified and promoted to help build up food-based tourism within the precinct'*.

It is clear that little analysis has occur in regard to downstream impacts as a result of increased flows the the Clyde South Precinct, likely because PSP preparation is yet to commence. Pask strongly objects to the draft CFS&DM DSS and PSP until downstream impacts are for fully resolved.

Proposed road network

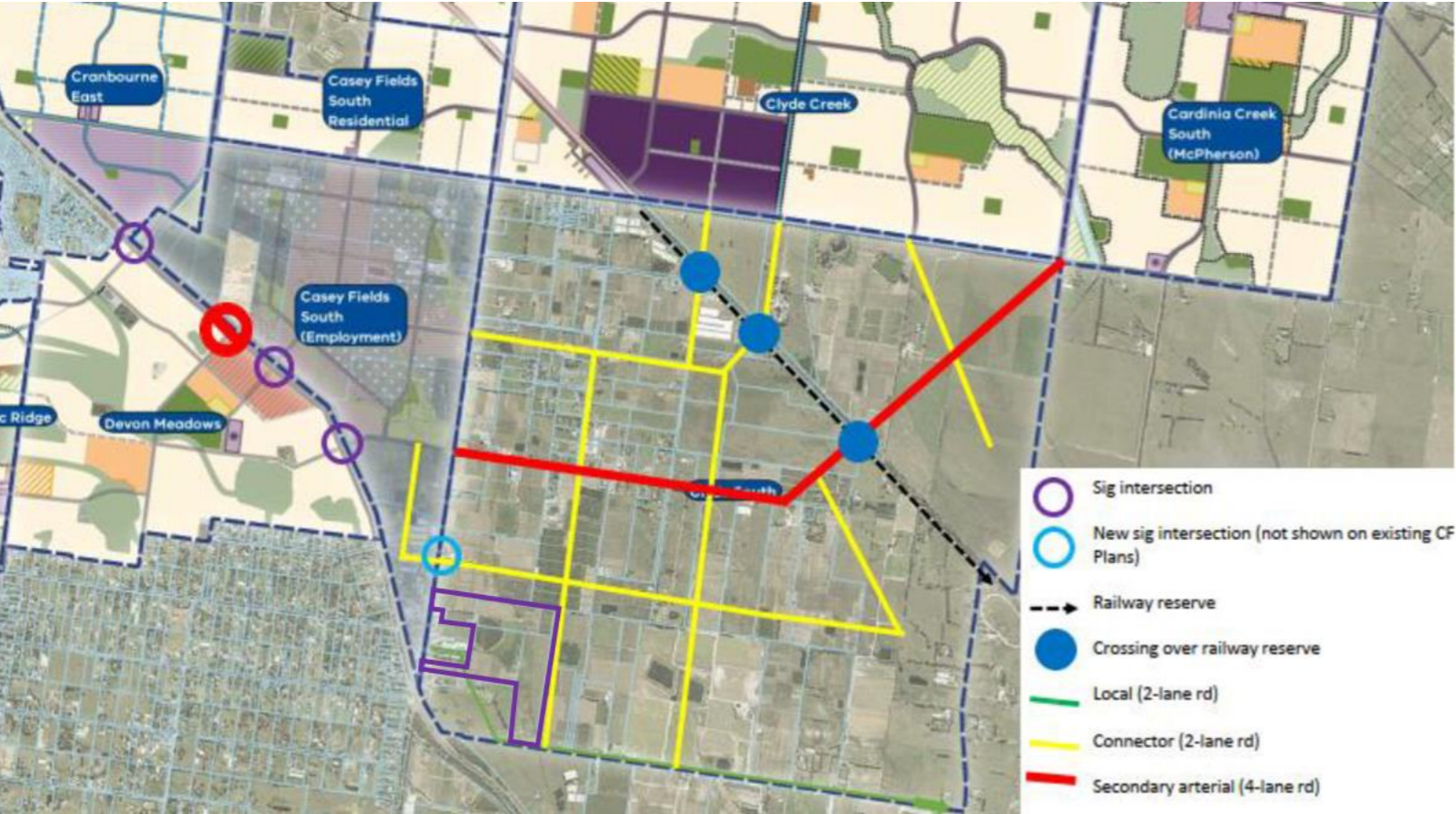
CFS&DM PSP Plan 4 – Movement Network identifies an indicative 4-lane secondary arterial road traversing 70 Clyde – Five Ways on a diagonal.

A review of the Strategic Traffic Modelling Report (which incorporates Clyde South) has been prepared to inform the proposed future road network for the CFS&DM PSP. Notably, the report does not provide commentary or imagery to support the indicative secondary arterial road as proposed on the subject land, as illustrated Figure 10.

It is submitted that the nomination of a future road network within the Clyde South PSP is more appropriately addressed through the Clyde South PSP.

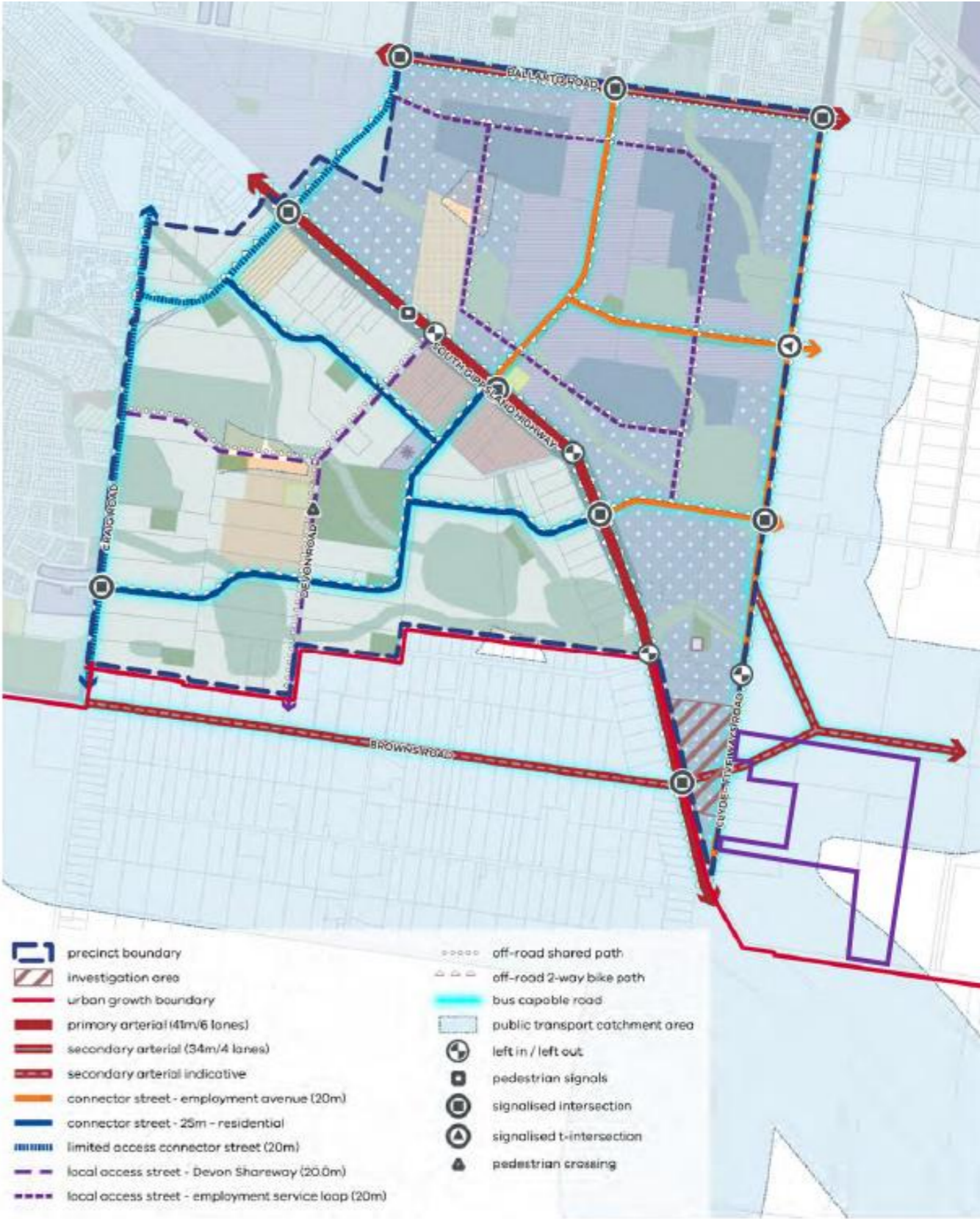
It is submitted that the proposed road network as it applies to 70 Clyde – Five Ways Road must be removed from all plans within the CFS&DM PSP as it is not justified.

Figure 10: Proposed transport network for Clyde South PSP (Source: Strategic Traffic Modelling Report Figure 4-2 (Jacobs, October 2024)



 10 & 70 Clyde – Five Ways Road and 45 Manks Road, Clyde

Figure 11: Extract from PSP Plan 4: Movement Network (VPA 2025)



 10 & 70 Clyde – Five Ways Road and 45 Manks Road, Clyde

Conclusion

Pask have an agreement with the current landowners to develop the properties at 10 & 70 Clyde – Five Ways Road and 45 Manks Road, Clyde following the gazettal of the future Clyde South PSP. As affected parties to the outcomes of the proposed drainage scheme, Pask strongly object to the draft CFS&DM PSP and the CFS&DM DSS as it applies to Clyde South PSP and the subject land.

The draft CFS&DM PSP and the draft CFS&DM DSS proposes land use outcomes that will directly impact and prejudice the existing land uses as well as potential development opportunities in the future on the subject land. Specifically, these documents support increased flows into Clyde South to facilitate the development of the Casey Fields South Employment and Devon Meadows Residential Precincts. The CFS&DM PSP also illustrates an inductive future road network across the subject land despite the land not forming part of the CFS&DM PSP.

Technical drainage advice highlights significant concerns regarding the limited analysis conducted on land within the Clyde South PSP. Specifically, there has been little attention given to managing increased flow downstream of the diversion waterway. The current operator of the land plans to continue agricultural uses until a planning permit is granted for subdivision and development as per the future Clyde South PSP. The existing operations on the land do not require any drainage upgrades. Therefore, the client questions how Melbourne Water plans to manage the substantial increase in flows through the subject land and downstream without negatively impacting existing land uses, especially given that the data suggests significant upgrades will likely be necessary.

From a future land use perspective, the client is concerned that the proposed drainage scheme will unfairly limit the development potential of the site before drainage issues are fully addressed and the technical analysis for the future PSP is completed.

To better understand the potential impacts and work towards a resolution for the broader region, Beveridge Williams has conducted a preliminary drainage investigation. Additional modelling and concept design is currently being undertaken to produce a more equitable solution, including:

- Removal of the diversion drain to be replaced with minor improvements to the existing channels downstream and including of a 225mm diversion drain for re-use.
- Redesign of the Devon Meadows basins to demonstrate that objectives can be met without the need to divert to Clyde South.
- Concept design of works downstream of Clyde Five Ways Rd to allow MW and the VPA to arrange a PAO to secure outfalls for Casey Fields.
- Additional concept design of a potential diversion drain around Lighthouse College.
- An examination of Casey Fields basins to determine if there is a more efficient/equitable distribution of assets.

In addition to the above, there are significant concerns regarding the financial burden that the drainage assets will place on our client, particularly the additional costs associated with multiple levies and the technical investigations required if upgrades to existing channels are required. It is submitted that any expenses generated as a consequence of the adjoining PSP must be incorporated into the CFS&DM DSS to ensure that our client is not further burdened by the CFS&DM PSP.

Finally, the CFS&DM PSP indicates a road network through the subject land. The Strategic Traffic Modelling Report does not provide commentary or imagery to support the application of this road, nor should the CFS&DM PSP include proposed future land uses, indicative or not, to properties located outside of the CFS&DM PSP. It is therefore submitted that the road network as it applies to the subject land be removed from the PSP.

