



31 March 2025

Mr. Peter Cooper
Senior Strategic Planner
Victorian Planning Authority
1 Spring Street
MELBOURNE VIC 3000

Dear Peter,

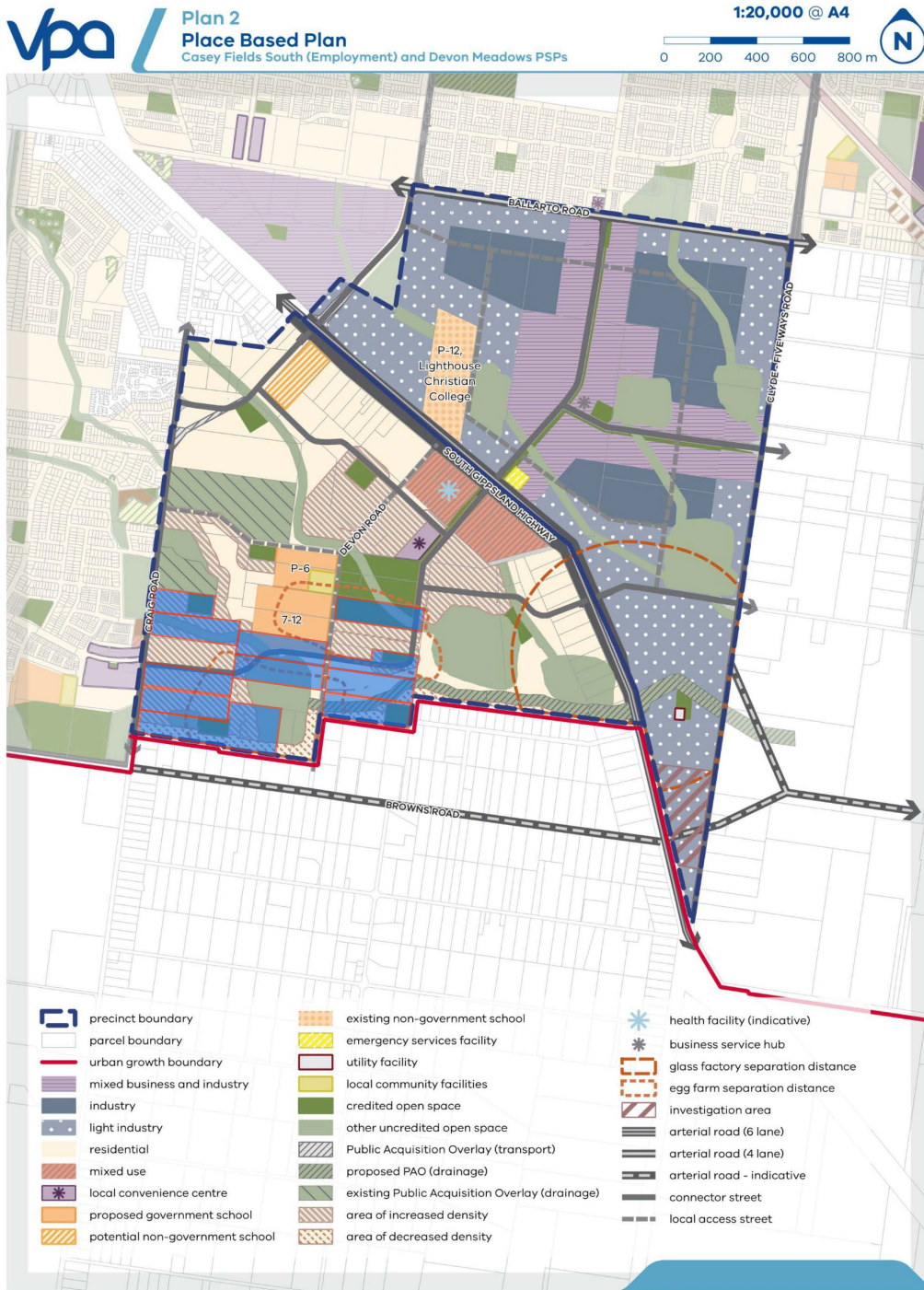
SUBMISSION TO CASEY FIELDS SOUTH (EMPLOYMENT) AND DEVON MEADOWS PSP

We thank you for the opportunity to provide a submission to the exhibited Casey Fields South (Employment) and Devon Meadows PSP.

SIG Group represent a total of 11 land parcels of land within this PSP. These land parcels are identified as Properties DM-48, DM-66, DM-69, DM-70, DM-72, DM-73, DM-74, DM-75, DM-78, DM-79 and DM-80 within the PSP, as identified in Figure 1 below.

We commend the Victorian Planning Authority for its efforts in the preparation of this PSP. We are supportive of the VPA's vision and intent of bringing forward employment and residential land uses within the Casey Fields South (Employment) and Devon Meadows PSP.

Figure 1: SIG Group Landholding



Upon review of the exhibited documents, we wish to provide a submission in response to the following matters.

Density and Housing Typologies

We are supportive of the provision of dwellings at varying densities and typologies within the PSP. The PSP identifies the provision of 'high density', 'transitional density' and 'balance area' on the site.

We acknowledge that there are instances where areas of transitional density directly interface with areas of high density. We submit that this interface is inappropriate as it does not consider the practicality of delivering dwelling typologies which are vastly different.

The target typologies need further review as they do not seem to reflect the viable housing products for the precinct in the foreseeable future. Our client believes that R1, G1, and Table 3 of the PSP are too restrictive. It is important to recognise that single dwelling land lots, whether over 300sqm sub-300sqm (Small Lot Housing Code), are the most efficient and popular housing types in the greenfield market. Forcing the delivery of three typologies in each residential area may jeopardise or slow the delivery of dwellings to the market.

We submit that further consideration is warranted to allow for greater flexibility in increasing the density target for 'transitional density' areas. It is our recommendation that the target density applicable to 'transitional density' areas is increased to 18 dwellings or more per NDHa to allow for a better transition along this interface. An increase in target density is also reflective of the product mix envisioned for this transitional area (i.e townhouses, semi-detached dwellings). These products cannot be delivered if the Council were to insist on a density of 12 dwellings per hectare at the planning permit stage.

Affordable Housing

The 10 per cent affordable housing target is not viable. While affordable housing is a crucial issue more broadly, the lots delivered in the Devon Meadows precinct will inherently be affordable. This PSP is not the appropriate mechanism to dictate specific housing outcomes, such as prescribing dwelling types based on the number of bedrooms.

We also note that the Housing Needs Assessment Report does not accurately reflect the household types expected in the PSP area and should not be relied upon for guidance on built form outcomes within the precinct. Importantly, the report recognises that there are a limited number of community housing providers within Casey, making it difficult for a landowner to even deliver on the outcomes sought by the PSP.

Part 4 of the Housing Needs Assessment Report outlines the steps involved in securing affordable housing provision. This in itself flags the potential for negotiations around affordable housing to delay the planning and design process, stalling the delivery of traditional lots to the market. We also note that Step 3 of the process relates to incentives and levers, which have not been identified as part of this PSP.

Constrained land

The ability to develop the southern sections of properties DM-78 and DM-80 needs to be re-considered. These areas could be landlocked due to barriers posed by the position of waterways and open space reserves, limiting the ability to connect to Devon Road and Craig Road respectively. Similarly, consideration should be given to the residential outcomes that may be possible having regard to access opportunities and the dimensions considered available for development.

The same can be said for parts of properties DM-69 and DM-70 which are cut off by the proposed waterway alignment.

We also note that the extent of DM-RB-05 on Plan 6 does not appear to be reflected in other plans within the PSP. This should be clarified so that net developable area can be accurately assessed.

Should this land be found to be constrained and if no viable residential outcome can be achieved, then this land should not be identified as developable in the PSP and ICP, and suitable compensation should be provided.

Egg Farm Separation Distance

Egg farm separation distances are currently identified across part of the landholding due to existing egg farms on the land. Whilst we note that separation buffers are informed by EPA Guidelines, we are undertaking a review of the identified distances applied to the land and will request that the buffers shown are based on an assessment of actual operating conditions.

Open Space

The PSP identifies four local parks (DM-LP-05, DM-LP-07, DM-LP-08 and DM-LP-09) to be provided across our various landholdings. Whilst we are supportive of the provision of amenity within the precinct, we would like to reserve the ability to revisit the distribution of open space within the precinct.

Whilst the PSP identifies a portion of the active open space (DM-SR-01) to be delivered on one of our landholdings. We submit that we would like to review the quantum, alignment and need for the active open space at this location.

Waterway and Wetlands

The PSP identifies multiple drainage assets (DM-RB-04 and DM-RB-05) and waterways within our landholdings. The suitability of the waterway alignments and the quantum of wetlands required for the precinct should be revisited.

We request that further investigations are undertaken regarding the alignment of the proposed waterways and drainage assets to assist with its delivery by minimising coordination between separate landowners. Further, there may be opportunities for the drainage assets to be designed more efficiently, such as locating the southern waterway on the edge of the precinct, to remove the issue of landlocking raised above and improving the development potential of affected properties.

While we are comfortable with the staged approach to development across the precinct, coordination with Melbourne Water is essential, given that Requirement R28 will require upfront delivery of all stormwater assets in their ultimate form before any development can proceed.

Native Vegetation Retention

Consideration should be given to the ability to retain the native vegetation identified along future road reserves. Bespoke cross sections should be considered, which could see these trees within the road reserve or within a linear open space reserve, similar to that adopted in the Employment Avenue cross section in the Casey Fields South precinct. We see this as being an area of contention that has the potential to delay future planning permit applications.

Education Facilities

We encourage the VPA to continue to liaise with the Department of Education with respect to the need for both Government Primary and Secondary School within the Devon Meadows precinct, particularly since the background report prepared to support this Planning Scheme Amendment clearly identifies that the Devon Meadows precinct only generates demand for 0.34 of a Secondary School. The proposed Secondary School occupies 8.4ha of land in what is a very constrained precinct. That land could be returned to developable area, providing further opportunities for housing.

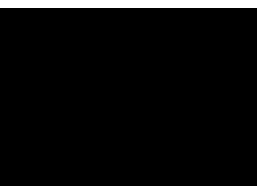
Other matters

Overall, we believe there are changes which can be made to the PSP to manage land acquisition (with respect to the high level of fragmentation), improve traffic movements and deliver a waterway network which does not compromise residential outcomes, creating a more efficient layout and a higher residential yield. This will also assist with the delivery of key infrastructure within the precinct. For example, the proposed government secondary school (7-12) is currently located across three different landownerships. There may be an opportunity to review its location to reduce the number of affected parcels.

Further, we note that the Requirements and Guidelines of the PSP includes unnecessary specificity for matters which would also be captured in other parts of the Planning Scheme. We recommend that a further review of the PSP is undertaken.

We look forward to our continued collaboration with the VPA to progress with finalization of the Casey Fields South (Employment) and Devon Meadows PSP. Should you have any questions in relation to this submission, they should be directed to the undersigned.

Yours sincerely,



Senior Development Manager
SIG GROUP