

31 March 2025

Mat Garner  
Director, South East Metropolitan Melbourne  
Victorian Planning Authority  
Via email: [Mat.Garner@vpa.vic.gov.au](mailto:Mat.Garner@vpa.vic.gov.au)

Dear Mat,

**DEVON MEADOWS/CASEY FIELDS SOUTH EMPLOYMENT PSP  
SUBMISSION ON BEHALF OF RAILWAY PROPERTY DEVELOPMENTS PTY LTD  
35 DEVON ROAD, DEVON MEADOWS (PSP PROPERTY: DM-27)**

Niche Planning Studio act on behalf of Railway Property Developments Pty Ltd, the owner of 35 Devon Road, Devon Meadows (Property DM-27 of the PSP).

Firstly, on behalf of Railway Property Developments Pty Ltd, we kindly thank the VPA and the City of Casey for their work in preparing the Devon Meadows/Casey Fields South PSP (DM/CFSPSP), and for the opportunity to provide this submission to the PSP.

**KEY SUBMISSION ITEMS**

Notwithstanding our support for the overall approach to the DM/CFSPSP there are a number of key submission items which require resolution:

**1. Location of Local Park (DM-LP-02)**

*Issue:*

In reviewing the PSP, we support the designation of a 1ha Local Park (DM-LP-02) on the subject site, to allow for passive open space and amenity for future residents. However, we seek to relocate DM-LP-02 to the eastern boundary along Devon Road, to provide for an open space link close to the Mixed Use and Town Centre areas, as well as leveraging off the amenity of the existing native vegetation (discussed further in Item 2 below), which is required to be retained by Requirement 10 (R10) of the PSP.

This approach is consistent with recent PSPs, such as the Craigieburn West PSP & the Officer South PSP and would seek to consider a portion of the vegetated area as unencumbered open space (ie. as a local park), which would provide for the native vegetation to be retained and designed as part of a creditable open space. We also note that similar approaches have been undertaken in the Devon Meadows PSP, including DM-LP-01, DM-LP-04, DM-LP-05 & DM-LP-09.

We seek the same opportunity to retain vegetation within the local park afforded to DM-LP-02 to allow for the retention of some of the high-quality existing vegetation along Devon Road, incorporating this into the local park to allow for additional amenity opportunities.

**Planning and Urban Design**

**ABN** 35 334 392 034  
**W** [nicheplanningstudio.com.au](http://nicheplanningstudio.com.au)

**VIC BOONWURRUNG COUNTRY**  
Unit 1, 286 Ferrars Street  
South Melbourne VIC 3205

**WADAWURRUNG & DJA DJA WURRUNG COUNTRY**  
Suite 8, 11 Davey Street  
Ballarat Central VIC 3350

**WA WHADJUK NOONGAR COUNTRY**  
Level 2, 896 Canning Highway  
Applecross WA 6153

**TAS PALAWA COUNTRY**  
Level 1, 14 Molle Street  
Hobart, TAS, 7000

We are more than happy meet with the VPA & Council to workshop the final location and orientation of the local park to ensure a favourable outcome for the future residents.

*Resolution:*

- Relocate DM-LP-02 to the east along Devon Road, as per the attached plan (Attachment 1)

## **2. Retention of Native Vegetation (Requirement 10)**

*Issue(s):*

Notwithstanding our comments in Item 1, the inclusion of R10 requires the retention of native vegetation as outlined in Plan 13 (pg. 69) of the PSP. Upon review of this requirement, as well as Plan 13, we believe further consideration should be given to the requirement. Whilst we are supportive of retaining existing native vegetation, in so far that it provides ready-made amenity for future residents, we are concerned by the amount of vegetation that is required to be retained along the site. The existing vegetated area along the site measures approximately 0.6ha, of which the majority will be undevelopable due to the extent of vegetation. In our view, this requirement should only be required for scattered, single stand vegetation, where a design solution can be administered with minimal impact to the net developable area.

Furthermore, it is unclear if consideration has been given to the Connector Road which runs adjacent to the northern boundary of the site, and whether allowance has been made within Plan 13 for [REDACTED] to continue [REDACTED] but needing to retain vegetation. Whilst we note that R10 provides for the removal of trees as per the below quote and we are supportive of this provision, in the circumstance of this connector road, we believe that this should be reflected in Plan 13 to ensure that the PSP clearly facilitates the connection of this Connector Road through to Devon Road, alleviating any potential post-permit issues.

*"....it can be demonstrated that: .... e) Removal of the tree(s) is necessary to provide for the functional and operational needs of infrastructure, including, drainage, community infrastructure, [REDACTED] road network"*

In addition, it is unclear whether consideration of the future Devon Road cross-sections has been taken into account. We note there is additional infrastructure (including on street parking and shared paths) being proposed as part of the future cross-section, which will likely have an impact on the TPZ's of the existing native vegetation to be retained (as outlined by Plan 13). Again, we understand that this is outlined by R10 as an ability to remove the vegetation (if demonstrated). However, we would seek that any vegetation with TPZ's that encroach more than 10% into Devon Road be removed from Plan 13 to provide clarity and certainty through the implementation of a planning permit for the site.

*Resolution(s):*

- Remove any vegetation to be retained on Plan 13 from the alignment of the Connector Road to ensure the delivery of this road is facilitated by the PSP.
- Remove any vegetation to be retained on Plan 13 with TPZ's that encroach greater than 10% into Devon Road.

## **3. 30% Tree Canopy Cover (Requirement 11)**

*Issue(s):*

We are supportive of the need to provide tree canopy cover as part of the future development of the PSP to ensure a high-quality urban environment. However, we have some concerns with the provision being written to exclude existing native vegetation. Where vegetation is required to be retained under Requirement 10 & Plan 12 of the PSP, this should contribute to the 30% tree canopy coverage. This also seems to conflict with Guideline 22, which states:

*"The design of subdivision and development should facilitate the retention of existing canopy trees to contribute to the 30% canopy tree cover target where practical."*

In addition, we also have concerns regarding how tree canopy coverage will be calculated/measured through a planning permit for subdivision. As the majority of permits applied for within the PSP area will be for a subdivision under Clause 56 (which does not currently include tree canopy targets), it remains to be seen how this will be demonstrated or assessed.

*Resolution(s):*

- Redraft R11 to state:

*"Canopy tree coverage within the public realm must achieve a minimum of 30% coverage (excluding ~~including~~ areas dedicated to biodiversity, native vegetation conservation, and drainage assets)"*

- Provide further guidance regarding how a planning permit for subdivision will be redemonstrated

#### **4. Confirmation of Staging/Sequencing Requirements**

*Issue(s):*

We note the new Requirements (particularly R19 & R27) regarding the sequencing of development within the PSP. Whilst we understand the basis for these provisions, we express concerns that the provision does not allow for the timely and efficient development of the land, rather that this provides landowners with the ability to control the timing of the development of the PSP.

As the majority of Devon Road is currently fully serviced (sewer, water, power, NBN) we would seek the ability to develop as an earlier Stage in the sequence. We understand that the key infrastructure to be delivered relates to drainage infrastructure, being the waterway diversion to the south.

We do support the inclusion of a Public Acquisition Overlay (PAO) for the Waterway Diversion, however we believe there should be some timing within the PSP regarding when this land is required to be acquired. This would serve to reduce the risk of the PSP being left 'untouched' due to landowners either land banking or not seeking to develop their property.

*Resolution(s):*

- Include, within the PSP, detail/information regarding the timing of the acquisition of the land under PAO4 to provide certainty regarding the delivery of the Waterway Diversion (WD1, WD2, WD3, WD4). This could be included as an additional column in Table 8 regarding timing of infrastructure.

#### **5. Infrastructure Contributions**

*Issue(s):*

We note that the ICP has not been Exhibited, which means it is more than likely to be considered a Standard Levy ICP. We retain the right to provide any additional commentary on the ICP, should it be required as a Supplementary Levy ICP.

*Resolution(s):*

- Advise of the status of the ICP.

## **6. Surrounding Landowner Submissions**

*Issue(s):*

Noting other landholder/developer submissions may likely impact our client's landholding, we respectfully request the VPA keep us informed of submissions that may have implications on our client's landholding and reserve the right for further submission/s during VPA and Council's submissions consideration process.

*Resolution(s):*

- Advise of submissions which seek to impact the property at 35 Devon Road.

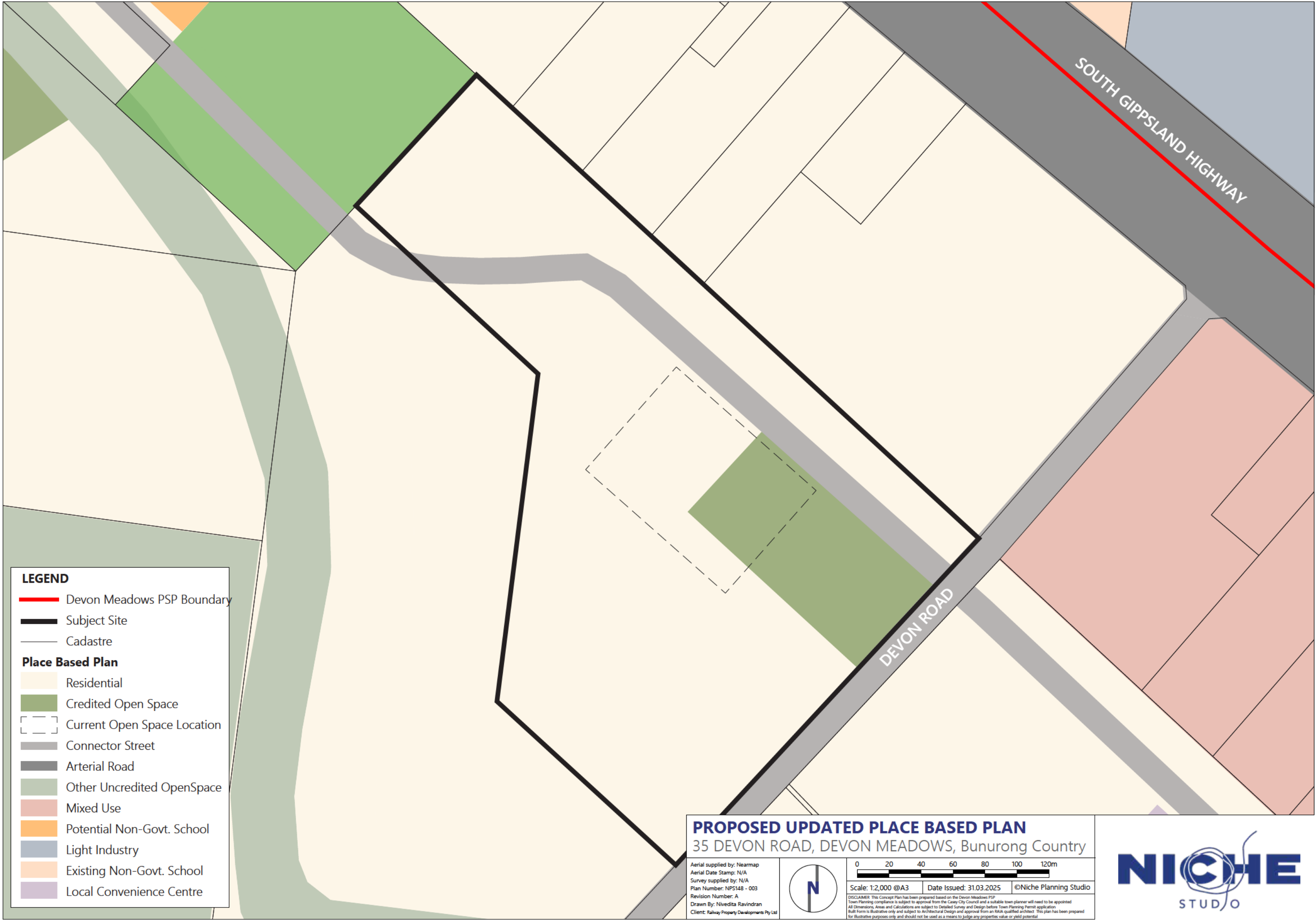
Once again, we thank the VPA for the opportunity to provide this submission and look forward to meeting to discuss and resolve the items raised in this submission.

Should you have any queries, or wish to discuss please contact myself or the undersigned on [REDACTED] or via email [REDACTED]

Kind regards,



[REDACTED]  
Principal



**LEGEND**

Devon Meadows PSP Boundary

Subject Site

Cadastre

**Place Based Plan**

Residential

Credited Open Space

Current Open Space Location

Connector Street

Arterial Road

Other Uncredited OpenSpace

Mixed Use

Potential Non-Govt. School

Light Industry

Existing Non-Govt. School

Local Convenience Centre

**PROPOSED UPDATED PLACE BASED PLAN**  
35 DEVON ROAD, DEVON MEADOWS, Bunurong Country

Aerial supplied by: Nearmap  
Aerial Date Stamp: N/A  
Survey supplied by: N/A  
Plan Number: NPS148 - 003  
Revision Number: A  
Drawn By: Nivedita Ravindran  
Client: Railway Property Developments Pty Ltd

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020406080100120m

Scale: 1:2,000 @A3

Date Issued: 31.03.2025

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DISCLAIMER: This Concept Plan has been prepared based on the Devon Meadows PSP  
Town Planning compliance is subject to approval from the Casey City Council and a suitable town planner will need to be appointed  
All Dimensions, Areas and Calculations are subject to Detailed Survey and Design before Town Planning Permit application  
Built Form is illustrative only and subject to Architectural Design and approval from an RAIA qualified architect. This plan has been prepared  
for illustrative purposes only and should not be used as a means to judge any properties value or yield potential