

Submission to

Casey Fields South Employment & Devon Meadows PSP & Amendment C295case

42-48 Craig Road, Devon Meadows 3977

Client
Ancorp Civil

Issued
31 March 2025



Executive Summary

The landowner of 42-48 Craig Road, Ancorp Civil, welcomes the overall concept of the exhibited Precinct Structure Plan (PSP), recognising its role in allowing residential development within the Devon Meadows precinct. Whilst generally supportive, the landowner makes the following submission.

The draft PSP provides a staging plan to allow the orderly development of the region. We submit that the subject site, which borders Stage 1a, can be included in this stage of development. The site forms a gateway to the PSP facilities and will have access directly from Craig Road. This will also assist with providing another source of funding for expensive drainage infrastructure, which poses a barrier to implementing Stage 1a of the PSP in a timely manner.

The site is well placed for higher density development, which is largely acknowledge by the PSP. However, we suggest that given the high allocation of land for infrastructure purposes, the PSP will benefit from allowing a greater proportion of higher density development, where appropriate. The site is surrounded by high amenity, including the future drainage reserves, parkland and schools. It also has access to an existing bus route. Accordingly, we request that the entire site is utilised for increased density development.

This submission makes the following statements:

- The subject site is ideally positioned for increased residential densities due to its proximity to open space, community facilities, and existing public transport access. Significant drainage infrastructure is required by the PSP, which reduces the developable area and incurs high costs. Increasing the development potential on the site will help fund necessary infrastructure and ensure timely delivery of the precinct.
- We propose that the subject site be included in Stage 1a of the PSP to better meet the criteria outlined in the VPA's staging background report. Requirement 27 of the draft PSP will ensure that necessary drainage infrastructure is constructed before the site is redeveloped. Rich surrounding amenity make the land ideal for early development, which will support the timely delivery of community facilities to the east. Including this site in Stage 1a will also provide additional funding for necessary infrastructure and act as a gateway to the precinct.
- We request that Aboriginal Cultural Heritage is resolved up-front in the PSP process, as a piecemeal approach may result in long delays, higher cost and fail to holistically integrate heritage within the design of the PSP. The 12 identified places of Aboriginal Cultural Heritage should have their boundaries specified, to remove an extreme unknown risk to development business, and minimise tax paid on undevelopable land. It is also requested that a body is nominated to manage this land so it can be quickly transferred.

Introduction

Beveridge Williams has prepared this submission to the Casey Fields South (Employment) and Devon Meadows Precinct Structure Plan (CFSDM PSP) and associated Amendment C295case on behalf of the landowner at 42-48 Craig Road, Devon Meadows. The 7.469-hectare site is located within the west of the Casey Fields South (employment) and Devon Meadows PSP (CFS&DM PSP). It includes a western frontage to Craig Road.

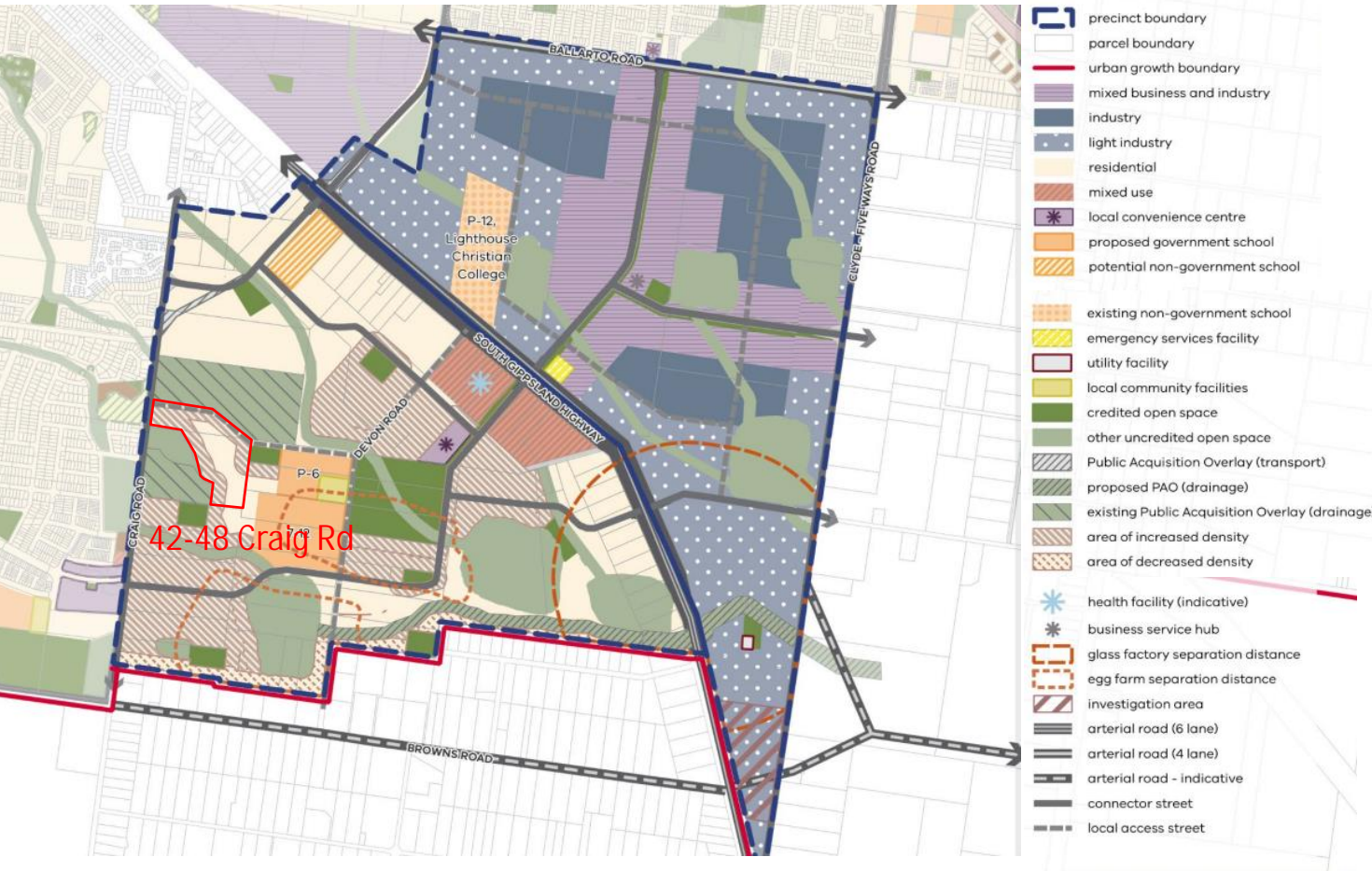
Specific to the site, the draft PSP proposes a mix of standard and increased residential density on the land. A local access street is envisioned in the north of the site.

The planning scheme amendment known as C295case seeks to implement the draft PSP and the relevant Infrastructure Contributions Plan (ICP). Amendment C295case seeks to apply several planning controls to the site at 42-48 Craig Road to facilitate future use and development in accordance with the PSP Plan 2: Place Based Plan. The proposed controls include applying the:

- Urban Growth Zone - Schedule 15 (UGZ15) which implements the CFS&DM PSP.
- Incorporated Contributions Overlay – Schedule 4 (ICO4) to the whole site, supporting the relevant draft ICP.
- An Environmental Audit Overlay to the land

The amendment also proposes to amend the Schedule to Clause 52.17 Native Vegetation. An exemption will be added to this clause, allowing vegetation to be removed, except where protected by Plan 13 of the PSP.

Figure 1: Extract from PSP Plan 2: Place Based Plan (VPA 2024)



Subject Site and Surrounds

The site at 42-48 Craig Road is an irregularly shaped parcel of 7.469 hectares. The site is used as a storage area with few permanent structures located on the site. The site is predominantly flat, with minimal vegetation along the western boundary adjacent to Craig Road. Outside of the storage area, the site is largely cleared. Vehicle access is provided via a driveway from Craig Road on the western boundary.

The surrounding area presents a mix of land uses. To the west, residential properties associated with the completed Botanic Ridge PSP are present, while the northern, eastern, and southern boundaries predominantly feature rural living allotments used for agricultural purposes, interspersed with scattered dwellings. To the south of the site, there is a quarry and to the northeast, a dam is present.

The Cranbourne Train Station is approximately 9.5 km to the northwest, while the Clyde Town Centre is around 6.2 km to the northeast. The South Gippsland Highway entry is approximately 4.8 km to the west, providing connections to Greater Melbourne to the north and South Gippsland to the southeast. Craig Road and Fisheries Road offer good north-south connectivity in the area.

Property Details	
Address	42-48 Craig Road, Devon Meadows 3977
Formal Description	Lot 1 PS800995 and Lot 1 PS800996
Municipality	City of Casey
Site Area	7.469 hectares
Zone	Farming Zone – Schedule 3
Overlay	N/A
Area of Aboriginal Cultural Heritage Sensitivity	Yes
Bushfire Prone Area	Yes
Melbourne Strategic Assessment Area	Yes

Title Details

42-48 Craig Road is formally known as Lot 1 PS800995 and Lot 1 PS800996. There are no easements on the land.

Figure 2: Site Context Aerial (MetroMap 2025)

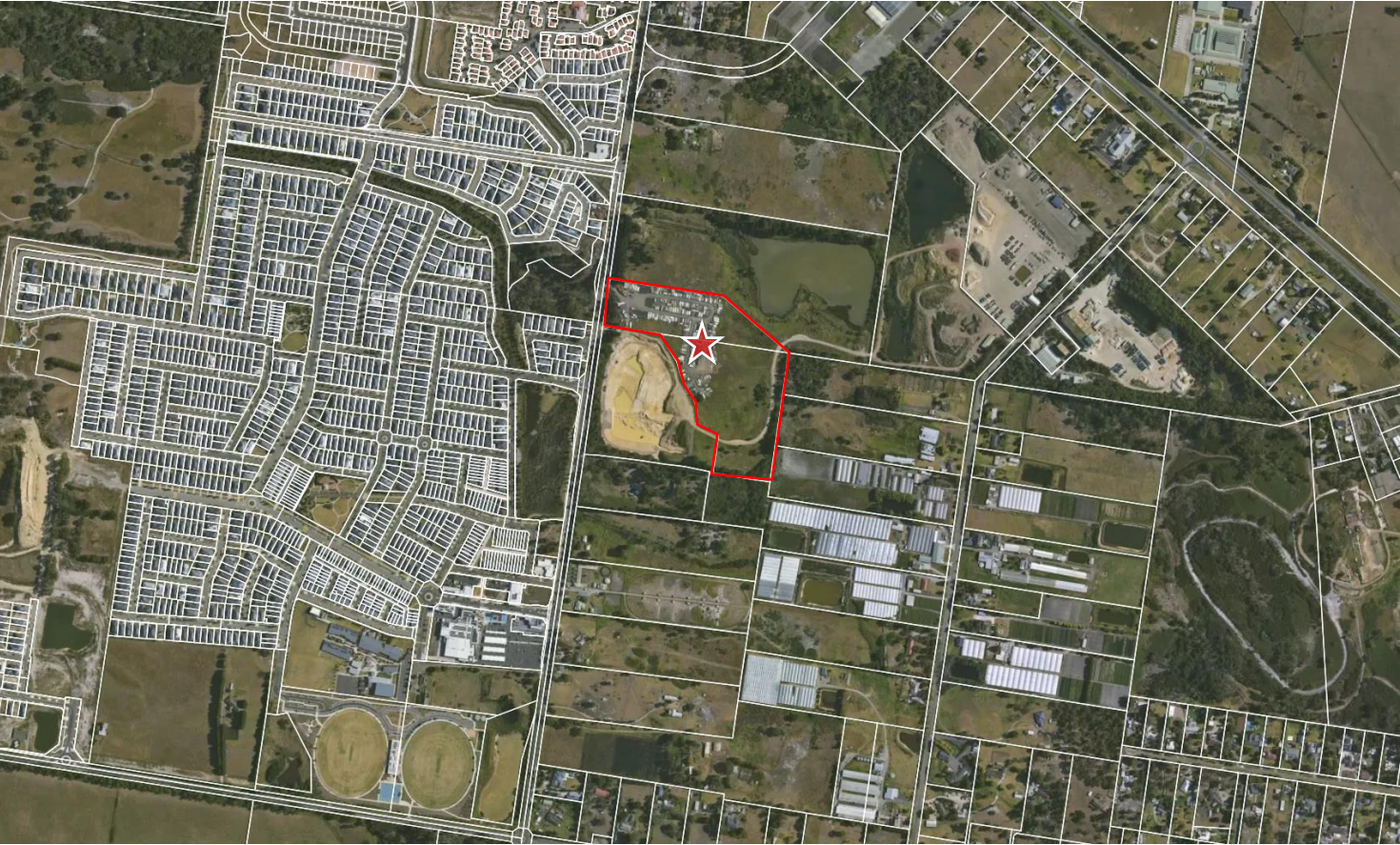
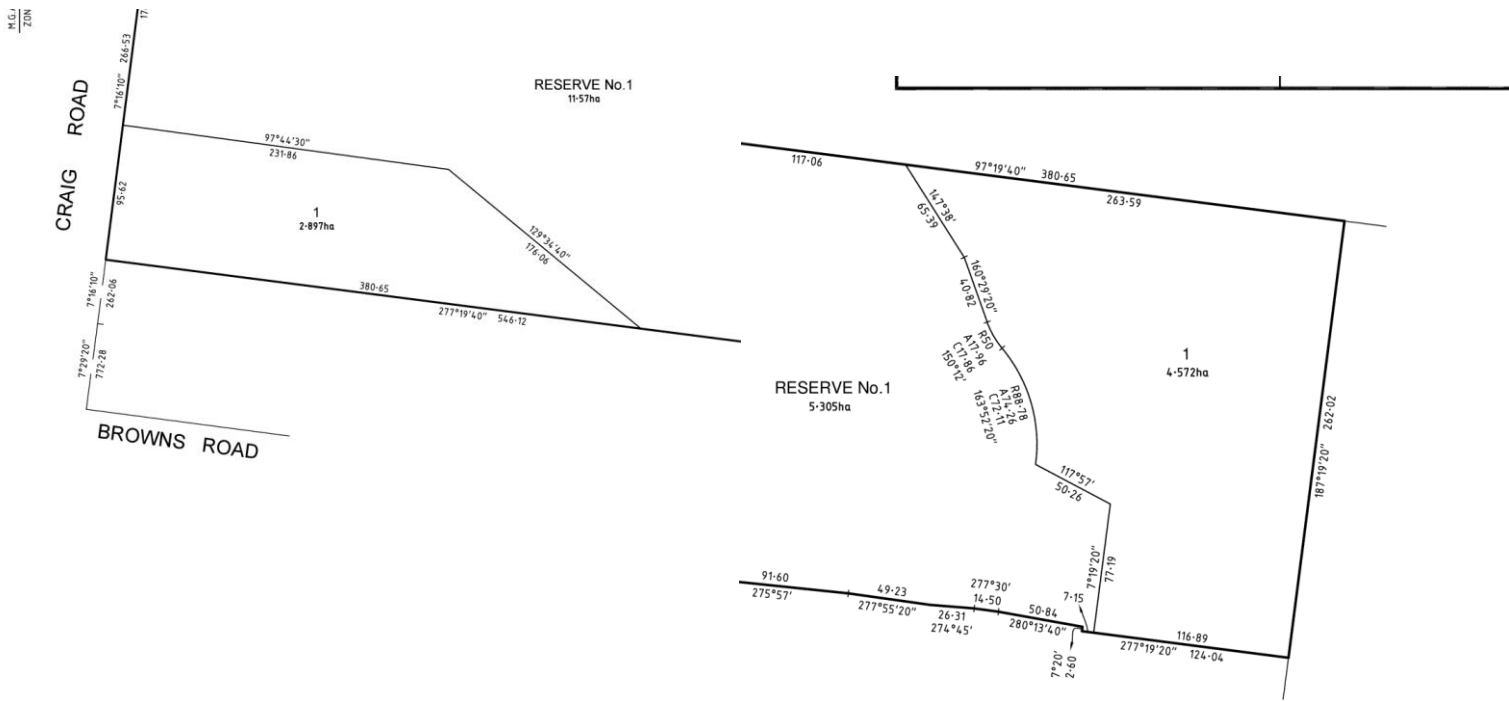


Figure 3: Extract from Title – Lot 1 PS800995 and Lot 1 PS800996



Existing Planning Controls

The land is located within the City of Casey and is subject to the provisions of the Casey Planning Scheme. The site is zoned Farming Zone – Schedule 3 (FZ3) and no overlays currently apply.

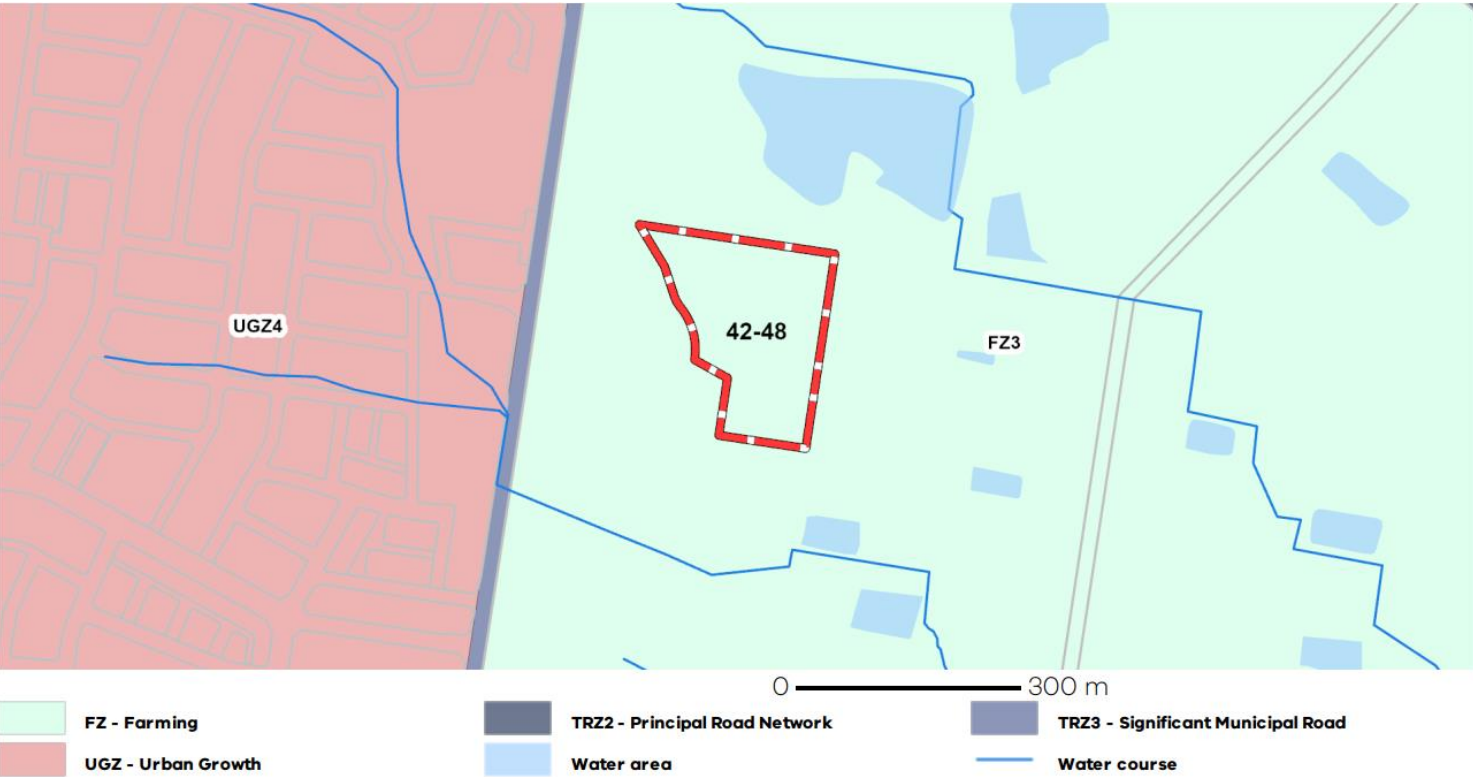
Clause 35.07 Farming Zone – Schedule 3 (FZ3)

The site is subject to the Farming Zone – Schedule 3 (FZ3). The purpose of the Urban Growth Zone is:

- To implement the Municipal Planning Strategy and the Planning Policy Framework.
- To provide for the use of land for agriculture.
- To encourage the retention of productive agricultural land.
- To ensure that non-agricultural uses, including dwellings, do not adversely affect the use of land for agriculture.
- To encourage the retention of employment and population to support rural communities.
- To encourage use and development of land based on comprehensive and sustainable land management practices and infrastructure provision.
- To provide for the use and development of land for the specific purposes identified in a schedule to this zone.

Pursuant to the current controls at Clause 35.07-1, a permit is not required for a dwelling, granted it is the only dwelling on the lot and the lot is at least 8 hectares. In accordance with Clause 35.07-3, a permit is required to subdivide land.

Figure 4: Existing FZ (Source: VicPlan)



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

Casey Fields South (Employment) and Devon Meadows PSP

The draft Casey Fields South (Employment) and Devon Meadows PSP combines a residential precinct and an employment precinct within a single PSP process. Both precincts are physically separated by the South Gippsland Highway, resulting in differing character.

The draft PSP Vision applicable to Devon Meadows notes that ‘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 western portion of Devon Meadows, with recently developed land abutting the west of the precinct. The property is identified as DM-25 and DM-41 on the PSP. The draft PSP proposes standard residential land on the majority of the site, with increased density abutting boundaries. A local access street is envisioned on the northern boundary. Some vegetation is marked for retention on the eastern and western boundaries. The landowner seeks to increase the density of the land. Additionally, it is requested that the site is shifted to Stage 1a.

The PSP is informed by the Infrastructure and Development Staging Background Report (March 2025) (IDSBR). Within this submission, we consider the criteria utilised by the IDSBR to show that the subject site is suitable to be included within Stage 1a of the draft PSP.

Proposed Planning Controls

The draft planning scheme amendment proposes to rezone the land to the UGZ15. The Urban Growth Zone will apply Clause 32.07 – Residential Growth Zone – Schedule 1 to the areas of increased density and Clause 32.08 – General Residential Zone to the remainder of the land. A local access street is proposed along the northern property boundary with direct access to Craig Road. The landowner supports the application of the RGZ and GRZ as the applied zones, though it is submitted that the Residential Growth Zone could be further utilised, given the site’s proximity to amenities.

The draft planning scheme ordinance includes the requirement to prepare a range of site assessment reports to accompany a planning permit application to subdivide the site. In particular, we note that an acid sulfate soils assessment is required where the background report states that there is extremely low probability of encountering acid sulfate soils on our client’s site. Further there is a requirement for an acoustic report, noting that this site is isolated from major roads and industry.

We submit that the proposed wording ensure that such reports are not required on a mandatory basis but only as appropriate to each site.

The amendment will also apply the EAO overlay to the subject site as well as Incorporated Contributions Overlay – Schedule 4 (ICO4).

The amendment will also create an exemption within Clause 52.17 Native Vegetation to allow the removal of vegetation, except when protected by the PSP.

The amendment will alter Clause 72.03 to include the revised list of maps within the Casey Planning Scheme, including the maps within the scheme. The schedule to Clause 72.04 will be amended to include the PSP document within the scheme.

Land use and density of development

The subject site is well placed to support increased residential densities on the land, as it is located adjoining uncredited open space, and has community facilities proposed to the immediate east, including a local park and schools. Community facilities and a larger open space are also proposed to be located to the east. The existing Botanic Ridge Village is around 400m to the southwest. The site has excellent access to active and public transport, as it is served by the existing bus stop at 36 Craig Road and will have an off-road shared path.

Further to the above, we note that the precinct will require large quantities of drainage infrastructure, as well as typical amenities within the PSP. The drainage infrastructure occupies a large portion of the land, reducing the overall NDA of the precinct. Furthermore, this infrastructure is costly, and must be paid for by the remaining NDA. We suggest that any effort to increase the development potential of the surrounding land will assist in ensuring the timely delivery of the precinct.

Due to the high amenity of the site and need within the precinct to ensure facilities are funded, we submit that the site is well placed to support a further quantity of increased residential density.

Staging of the Precinct and Delivery of Infrastructure

Staging Considerations

We submit that the subject site should be placed within Stage 1a of the PSP, as this would better meet the criteria of Step 2 within the staging background report prepared by the VPA.

The subject site is well suited to be developed during Stage 1 of the PSP. It is situated immediately adjacent to Craig Road, with the connector road to form a gateway to the site. Accordingly, development can commence from this direction, with good access to the road network (criteria 1). The bus stop at 36 Craig Road will provide public transport opportunities to future residents (criteria 2).

Drainage considerations will not form a barrier to including the site within Stage 1a. Requirement 27 of the draft PSP specifies that drainage along the southern boundary of the PSP must be prepared prior to the statement of compliance of any stage of subdivision of any PSP parcel. Accordingly, the infrastructure will be constructed prior to dwellings (criteria 3). Furthermore, including additional land within Stage 1a will provide greater incentive and revenue to assist with the construction of drainage assets.

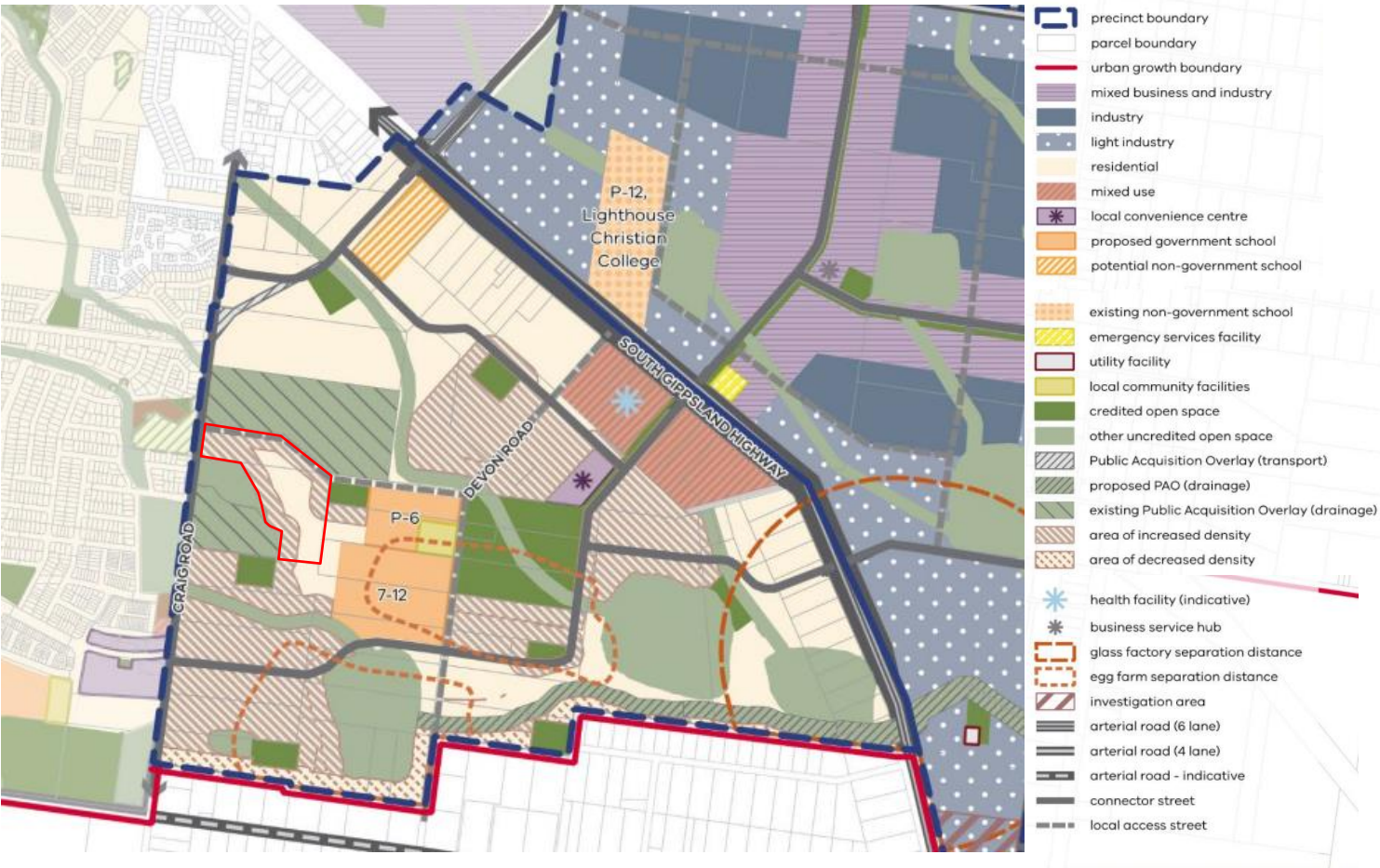
The early development of the site will support the timely delivery of community infrastructure. The subject site will act as a gateway to the primary school and open space, located to the east of the site. Commencing creation of this access street will allow earlier connection to these facilities, supporting infrastructure provision (criteria 4).

In addition to the above, we note that the site is well paced in relation to the nearby existing town centre, as well future water infrastructure (see page 4 of staging background report). By paving the way for the construction of the nearby primary school and open space, our proposed alteration to the PSP is in accordance with PSP 2.0 Feature 17.1, which aims to provide timely and efficient delivery of assets.

Based on the above, we request that 42-48 Craig Road is shifted within Stage 1a of the PSP in recognition the benefit of providing additional funding for initial drainage infrastructure, and its excellent placement as a gateway to the precinct.

VPA Staging Criteria	
VPA Staging Factor	BW Response:
Key proposed movement network infrastructure and Intersections	The subject site has direct access to Craig Road, and a local access street is envisioned to the north. This road will form a gateway to the PSP, and enable the first stage of development to commence.
Key proposed public transport infrastructure	The site will have access to the existing bus stop, located at 36 Craig Road.
Key proposed drainage	Requirement 27 of the draft PSP specifies that drainage along the southern boundary of the PSP must be prepared prior to the statement of compliance of any stage of subdivision of any PSP parcel. Accordingly, the infrastructure will be constructed prior to dwellings.
Key proposed community infrastructure, including schools, community facilities and emergency services	The subject site will act as a gateway to the primary school and open space, located to the east of the site.
Criteria specified in staging background report.	

Figure 5: Extract from PSP Plan 2: Place Based Plan (VPA 2024)



Aboriginal Cultural Heritage

The VPAs website states that The 2.0 process aims to:

- *Co-design of a Place-Based Plan*
- *Achieve up-front, early resolution of issues*
- *Gain better and earlier information on infrastructure demands to inform agency planning and budget bids*
- *Update guidance on PSP content reflecting new government policy and promoting innovation*
- *Provide stronger guidance in PSPs for staging of development*

The unknown location and the extent of land required to protect the 12 identified places of Aboriginal Cultural Heritage creates uncertainty regarding whether the land uses proposed across the PSP can be realistically achieved.

The PSP guidelines articulately detail their aim to provide up-front, early resolution of issues. In its closing summary the Aboriginal Cultural Heritage Impact Assessment (ACHIA) that has been prepared to support the PSP states:

‘In recent years, archaeological salvage was considered to be an acceptable management condition. However, salvage itself is harm and for this reason is now considered a last resort management condition applied only where a development absolutely cannot avoid impact. Instead, the preferred management condition in place of salvage is the establishment of heritage parks, conservation zones or minimally landscaped passive open spaces’.

Further, Recommendation 3 notes:

‘Map 12 should be used as a starting point for designating open spaces. However, Map 12 provides indicative and likely locations for Aboriginal cultural heritage and should be ground-truthed with a formal archaeological survey prior to incorporation in PSP development planning’.

It is understood that the *likely locations for Aboriginal cultural heritage have yet to be ground-truthed with a formal archaeological survey.* Accordingly, if it is the VPAs intention to areas of cultural heritage into heritage and conservation parks and open space reserve, how will changes to the PSP and potentially the DSS be fairly and transparently communicated with the landowners right to respond to potentially significant changes to the designated land uses and NDA on their site.

It is submitted that the current location of the 12 identified places of Aboriginal Cultural Heritage should be identified to provide a full analysis of the precinct features that will consequently inform the land use outcomes and areas of constraint within this PSP.

It is further submitted that if Aboriginal heritage parks, conservation areas and passive open spaces are to be incorporated into the PSP in the future, the PSP must identify the ownership and management actions to be applied.

The stated departure from the salvage of artefacts is concerning as this approach is inconsistent with the stated aim of the growth areas which is to maximise scarce greenfield land for residential and community development.

Conclusion

The landowner of 42-48 Craig Road, known as Ancorp Civil, is generally supportive of the overall concept of the PSP. The work of the VPA to produce the CFS&DM PSP will allow the orderly re-development of the land and assist with supplying new homes to alleviate the Victorian housing crisis.

We request that a greater proportion of increased housing density is permitted on the site due to its strategic location adjoining uncredited open space and community facilities, including a local park and schools. The site's excellent access to public transport further supports the case for increased density, ensuring the timely delivery of the precinct and its amenities. This will assist the PSP to fund drainage infrastructure, which is particularly prevalent within the PSP.

Additionally, we propose that the subject site is included in Stage 1a of the PSP. The property will act as a gateway within the PSP, as it connects community infrastructure to Craig Road. Allowing development to proceed within Stage 1a will increase revenue available for constructing drainage assets, ensuring the PSP is delivered in a timely manner.

We strongly advocate for the upfront resolution of Aboriginal Cultural Heritage in the PSP process to avoid the potential for long delays, increased developer costs, and allow heritage to be integrated into the PSP design. Specifying the boundaries of the 12 identified Aboriginal Cultural Heritage sites will mitigate significant unknown risks to development and reduce taxes paid on undevelopable land. We also request the creation or nomination of a management body to whom preserved land can be transferred to at an early stage.