

7 April 2025

Martina Johnson
A/Executive Director - Metropolitan Melbourne
Victorian Planning Authority
GPO Box 2932
MELBOURNE VICTORIA 3000

Via email: mat.garner@vpa.vic.gov.au

Dear Martina,

PUBLIC CONSULTATION, CASEY FIELDS SOUTH EMPLOYMENT + DEVON MEADOWS PRECINCT STRUCTURE PLAN (PSP)

Thank you for your letter of 3 March 2025 advising of the commencement of public consultation.

Melbourne Water is supportive of working with the VPA and other government agencies in delivery of a whole of government approach in the planning for new greenfield precincts, including Casey Fields South Employment and Devon Meadows PSP.

In reviewing this PSP, we would like to highlight one of the conclusions by the Officer South Employment PSP Standing Advisory Committee (SAC) which viewed that the PSP was "*brought on too early given the preliminary state of the drainage strategy*". There is currently a similar situation present in this PSP, given there is still substantial work required to confirm the engineering drainage design, due to the unresolved risks associated with cultural heritage, groundwater, climate change guidelines, environmental values, Public Acquisition Overlay, and alternative designs submitted by stakeholders during the Public Consultation process.

Melbourne Water ABN 81 945 386 953
990 La Trobe Street Docklands VIC 3008
PO Box 4342 Melbourne VIC 3001 Australia
TTY 131 722 F +61 3 9679 7099
melbournewater.com.au
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As such, Melbourne Water strongly recommends that additional time is provided to complete a revised drainage strategy prior to the SAC hearing to address the issues flagged above. The benefit of having a revised drainage strategy could lead to a reduced number of drainage matters tabled at SAC and most importantly a higher certainty in the land requirements for the PSP (potentially both size and location of drainage land).

Melbourne Water has identified the following key issues following a detailed review of the draft documentation (refer to attachment 1, submissions log), commentary from stakeholders on drainage issues at consultation sessions, and submissions from stakeholders to the drainage strategy:

1. Recommend that the drainage strategy be revised prior to SAC hearing

A revision of the drainage strategy is required to give confidence to the land requirements of the PSP. The current draft PSP identifies “DSS investigation areas” which will be further consolidated or potentially removed all together with a revised strategy.

The following elements require further consideration:

- The Public Acquisition Overlay extent
- Alternative drainage asset locations
- Consolidation of drainage assets
- Optimisation of the size of waterways (and associated culvert crossings of the highway and Clyde Five Ways Road)
- Flow management downstream (flood flows and flow volumes) in receiving waterways, through Clyde South PSP and south of UGB
- Climate change design guidance to reflect current design standards
- Minimising impact to groundwater, cultural heritage and environmental values

The above have been or will be informed by submissions to the PSP from landholders and other stakeholders, and further background studies such as more detailed cultural heritage assessments. It is anticipated that by incorporating these changes to the revised strategy some of the issues raised by landowners and stakeholders will be resolved and the PSP land requirement confirmed.

2. Infrastructure and development staging

As you are aware, coordinating the staging of development in line with infrastructure delivery is crucial to provide for the timely delivery of future communities. Melbourne Water seeks to work further with the VPA in amending the Infrastructure and Development Staging for the PSP to meet the following objectives:

- Ensure critical ultimate drainage infrastructure such as the diversion channel, retarding basins and outfalls are delivered in a timely manner for flood protection
- Landowner developing an area that is likely to benefit from a DSS asset should be able to construct that asset
- Ensure environmental protection and maintain the necessary stormwater quality requirements
- Protect critical assets and minimise multiple disturbances
- Meet the design performance of the asset

The current staging proposal does not adequately ensure that the above objectives can be met resulting in potential delays to development in the PSP. For example, whilst the diversion channel Public Acquisition Overlay (PAO) will ensure the early transfer of private land to Melbourne Water, the current staging plan may actually hinder the early delivery of the diversion channel as there may be developers in stage S2a that may have the capacity/appetite to deliver this asset.

3. Public Acquisition Overlay diversion channel design and consultation

Melbourne Water is committed to undertaking a functional design and the relevant background surveys of the diversion channel PAO to ensure the land requirement and alignment are appropriate.

The current PAO extent in the PSP documentation is preliminary and must be finalised prior to Gazettal. The PAO extent requires revision to:

- Consider submissions from stakeholders for optimising the drainage design, e.g. for realignment and modified footprint, and potentially to lift (vertically) the concept design to minimise interaction with the groundwater table
- Minimise and avoid cultural heritage and high value trees
- Account for modifications to the drainage strategy upstream, which in turn, changes the design requirements for the waterway
- Optimise the land requirements

If the current preliminary PAO extent were to be Gazetted, this could carry the following risks:

- The diversion waterway may not be able to be constructed in this location (e.g. due to cultural heritage and other site constraints)
- Delay to development within Devon Meadows PSP until the drainage outfall is secured
- PAO footprint may be larger than required, thereby reducing net developable area and unnecessary additional land acquisition costs to the Development Services Scheme

We advise further that, as an example, the VPA and Melbourne Water commence targeted consultation with key landowners affected by the PAO (the landowner circled in yellow in Figure 1). This landowner has an existing use/business that will be impacted by the PAO. Their existing use may delay the delivery of the asset.

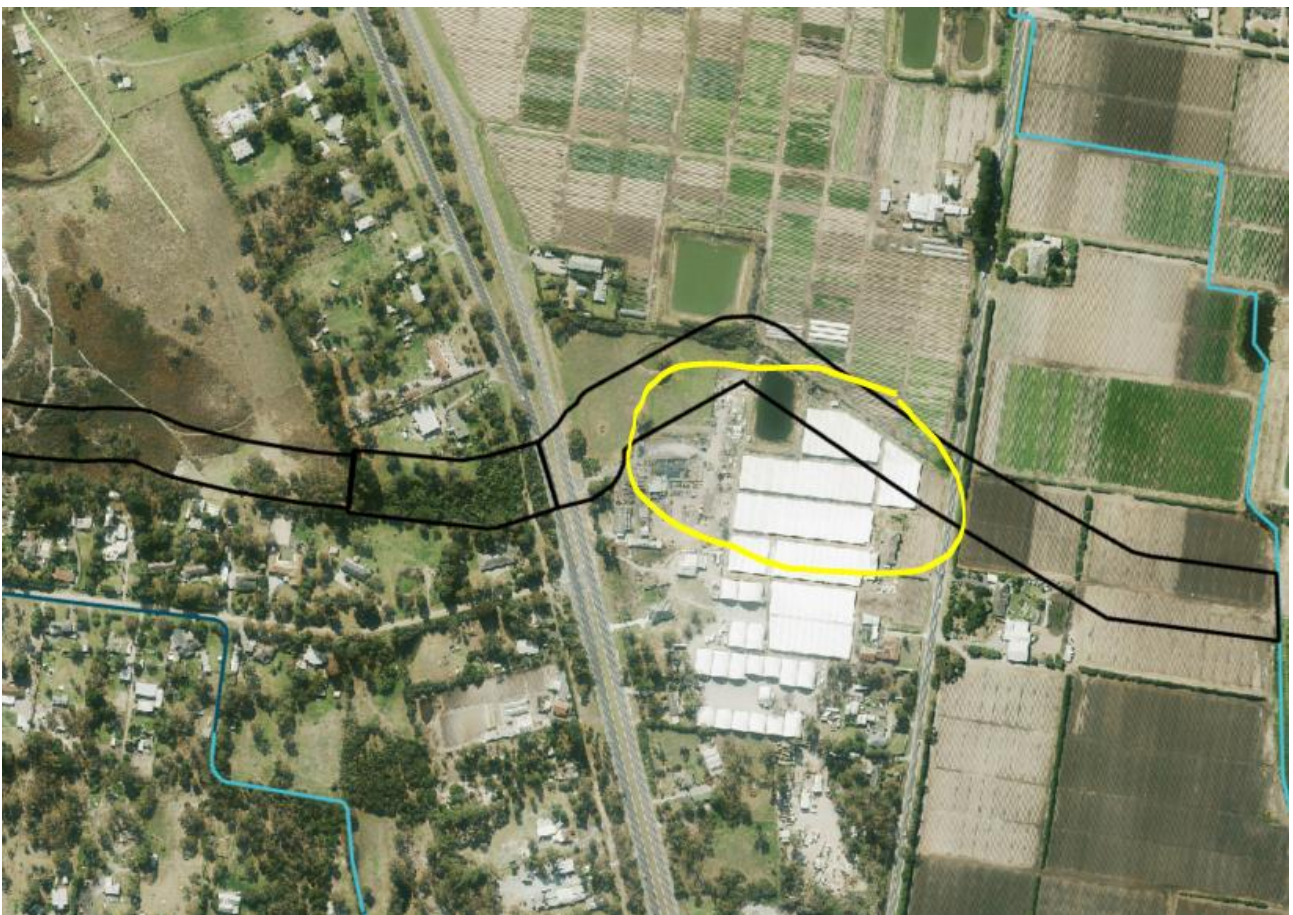


Figure 1 Proposed PAO in black; affected landowner in yellow.

4. Cultural heritage

Melbourne Water identifies significant risks associated with locating critical drainage and flood mitigation infrastructure within areas identified (or potentially) as culturally sensitive in the absence of clear guidance from the VPA.

Melbourne Water encourages an approach to drainage planning which considers Aboriginal cultural heritage values (both tangible and intangible) and culturally sensitive landscape features. Drainage planning should facilitate avoiding and/or minimising harm to heritage values, which will be identified through consultation with the Registered Aboriginal Party (RAP), the recommendations of any Cultural Values Assessment, and the findings of any Cultural Heritage Management Plan (CHMP) or heritage assessment.

Consideration should be given to appropriate setbacks and/or a redesign to avoid/minimise harm to identified heritage values. Melbourne Water notes that a Cultural Values Assessment was provided by the RAP for the PSP area, which contained a series of recommendations regarding native vegetation, and an investigation of the wallaby population. Critically for drainage planning, the RAP recommended an investigation of the remaining sand dune areas and any cultural heritage that may be present.

Melbourne Water requests that the VPA initiate additional heritage assessment of these identified areas, in order to inform harm avoidance/minimisation for drainage planning. Without this information, the "DSS investigation areas" will need to remain in the PSP in case our infrastructure need to be relocated to avoid high value cultural heritage.

5. Southern Brown Bandicoot habitat protection and native vegetation

Under the *Water Act 1989*, in performing its functions Melbourne Water must have regard to biological and ecological considerations.¹

Consistent with this, Melbourne Water raises the following matters for further consideration with the VPA:

- Further guidance regarding the priority to be given to tree retention in drainage asset siting decisions, noting that significant numbers of trees are marked for retention. In revising the drainage strategy, Melbourne Water as authorised under the *Water Act* will avoid or minimise adverse impact to high value trees, resulting in potential changes to the location of the drainage assets.

¹ Water Act 1989, s 93.

- However, applying avoid/minimise principles often involves trade-offs, for instance, trading off optimal/preferable locations for drainage assets from an engineering point of view against tree retention.
- It would assist Melbourne Water in considering further design of the drainage strategy to understand what weight VPA expects Melbourne Water to place on tree retention in different areas of the PSP.
- Furthermore, guidance is sought on the Aboriginal cultural values relating to native vegetation which may add further justification to avoid the removal of native vegetation.
- Melbourne Water is a partner in enabling the delivery of the Southern Brown Bandicoot (SBB) Biodiversity Conservation Strategy (BSC) which formalises the waterway corridors between Cranbourne Botanic Gardens and the edge of the UGB as bandicoot corridors. These corridors provide suitable habitat and connectivity for linking populations of SBB. While there has been significant investigation and recommendations made through the WSP 2025 Biodiversity report, much of this is not translated into the PSP.

Melbourne Water has concerns regarding high density interfaces with these critical habitat corridors, particularly light, noise and shadowing of built form of potential four-storey apartments. We request the PSP provide appropriate interface provisions so that this proposed built form is removed along the waterway corridors. Melbourne Water does otherwise support the higher built form surrounding retarding basins, where there is greater buffer due to the size of assets.

6. Groundwater

The revised drainage strategy will need to consider the risks of groundwater interaction. For this PSP, due to groundwater levels that are close to the surface, retarding basins, wetlands and waterways fully “in cut”, meaning much deeper in the ground may not be feasible because the assets will interact with groundwater and can compromise asset function, performance and maintenance.

Any interaction with the groundwater table should comply with the Koo Wee Rup Water Supply Protection District Groundwater Management Plan (GWMP) under the Water Act. The current design may need to be modified to ensure compliance. Melbourne Water will be looking to engineer out this complexity as much as practical, however this could still lead to the need for shallower assets, thereby increasing the drainage asset land requirements, and/or introducing embankments and need for widespread additional fill in adjoining development areas.

7. Climate Change

Melbourne Water is committed to ensuring the design of the drainage strategy factors in climate change requirements. The current drainage strategy which commenced in 2022 is based on Australian Rainfall & Runoff v4.1 standards. In August 2024 new updates to the Australian Rainfall & Runoff standards were introduced relating to Climate Change design. We foreshadow that a Melbourne Water policy change in response to the August 2024 updates is imminent and therefore it is more than likely that the revision of the drainage strategy will need to incorporate these changes which may or may not result in an increase to the drainage asset land requirements.

8. Integrated Water Management Opportunities

Where opportunities for Integrated Water Management (IWM) are limited in this PSP, development proposals must consider alternatives to address IWM objectives including opportunities in neighbouring PSPs or catchments. We seek that a whole-of-Government discussion is initiated to explore IWM opportunities for these PSPs, and in particular the future Clyde South PSP.

Melbourne Water is consulting with landholders in the Clyde South PSP and landowners outside of the Urban Growth Boundary to better understand the impacts of upstream urban development on the current and intended future use of their land. The result of this engagement may lead to revision of design objectives for flow and volume management within the current PSPs.

Conclusion

Melbourne Water is of the view that there would be significant benefit to delaying the SAC hearing until such time that the revised drainage strategy can be completed. This will enable Melbourne Water to appropriately consider Public Consultation submissions and would create greater certainty to the SAC and all parties involved in the process and would limit issues that have arisen in other SAC proceedings.

Should you have any questions regarding this project, please contact [REDACTED]
[REDACTED] Manager Strategic Planning, on [REDACTED] or via email
[REDACTED]

Yours sincerely



[REDACTED]
Senior Manager, DSS Strategic Planning + Engineering

Item No.	Document	Reference	Topic	Change requested by MW	MW Comment (on public version of PSP)	Supporting information
1	PSP document	1.4	General	Add new	Add new statement: "The PSPs are within multiple Development Services Scheme areas (DSS) - Devon Meadows, Clyde-Five Ways Road, Moores Road and Clyde Township DSSs. The PSP relies upon, and will assist in the implementation of the DSS."	
2	PSP document	2.2	PSP Purpose	Replace #5	Change to: "Deliver an integrated network of waterways and open spaces that tell the story of country, <u>safely and sustainably manage and drain stormwater</u> , <u>protect remnant vegetation</u> , provide amenity, and facilitate wildlife movement. "	
3	PSP document	Plan 2	PBP	Fix	Legend symbol for "existing Public Acquisition Overlay (drainage)" does not match the PAO symbol on the plan itself for the diversion channel PAO. Need to fix this.	
	PSP document	Plan 2 and Table 1	Housing Density	Amend	Melbourne Water do not support proposed 4 storey built form along waterways as detailed in High Density areas. This does not provide a suitable, sympathetic interface to sensitive ecological/waterway corridors. Built form should be stepped back from the waterways which reduces shadowing and amenity impacts from built form. Melbourne Water can support higher built form surrounding other drainage assets - RBs and wetlands as the ecological and amenity function can be accommodated given the greater area of asset. MW recommend wording be added to Table 1 Higher Density in "Decision guidance" Decision guidance • "Low to mid-rise developments should be prioritised along the periphery of waterway areas." • Development should result in an urban-neighbourhood character, with buildings up to four-storeys in height. • Applications for residential subdivision and development should deliver at least three different housing typologies.	
4	PSP document	All plans	All plans	Fix	There is a missing gap between one of the drainage RBs and the diversion channel. There needs to be a connected outfall here shown on all plans. MW to provide updated GIS. Refer to Fig 1	Fig 1: I:\MEL\Development Strategies\Drainage Schemes\2000's\2362 - Devon Meadows DS\Implementation\PSP Project GHD\9-
5	PSP document	R3	Safe, accessible	Add new	Add new statement in R3: "Crossings of waterways must be delivered where shown on Plan 4 Movement Network and must be designed to ensure that flood flows can still be conveyed by the waterway or the overland flow path, to the satisfaction of Melbourne Water"	
6	PSP document	Plan 4	Funding	Add new	New culverts crossing waterways are to be added on the plan (circled in red). These culverts are not DSS funded - VPA to determine the funding mechanism. Refer to Fig 2	Fig 2: I:\MEL\Development Strategies\Drainage Schemes\2000's\2362 - Devon Meadows DS\Implementation\PSP Project GHD\9-
7	PSP document	O16	High quality public realm	Replace	Replace O16 with: "To ensure stormwater is managed for flood protection factoring in climate change, the environment and water quality treatment."	

8	PSP document	R7	High quality public realm	Replace	<p>Replace R7 with wording from Croskell PSP:</p> <p>"Stormwater runoff from development must meet the performance objectives of the Commonwealth Scientific and Industrial Research Organisation Best Practice Environmental Management Guidelines for Urban Stormwater (or as amended) prior to discharge to receiving waterways and as outlined in Plan 6 Water, unless otherwise approved by Melbourne Water and the responsible authority.</p> <p>Proposals that exceed the performance objectives are highly encouraged and can be considered, all to the satisfaction of Melbourne Water and the responsible authority."</p>
	PSP document	R9	High quality public realm	Amend	<p>Subdivision and development involving the delivery of the DSS and PSP must effectively provide for the movement of Southern Brown Bandicoot between Royal Botanic Gardens and the Urban Growth Boundary, in accordance with the Sub-regional Species Strategy for the Southern Brown Bandicoot Supplement: Habitat Connectivity (DEPI 2134) and Southern Brown Bandicoot Habitat Connectivity Design Standards (DEECA 2023).</p> <p>Also add wording to include requirements for: bandicoot culverts under roads, suitable vegetation treatment within corridors, fencing, retention of habitat where feasible, survey efforts? (DEECA may advise otherwise).</p>
	PSP document	G21	High quality public realm	Add new (refer to G21)	<p>A new requirement should be added specific to waterways. Requirement from Donnybrook-Woodstock PSP:</p> <p>"Development must positively address all waterways through the use of frontage roads or lots with a direct frontage to the satisfaction of Melbourne Water and the responsible authority."</p> <p>We might add a disclaimer though relating to the diversion channel as this is not a typical waterway. TBC by MW.</p>
	PSP document		High quality public realm	Add new	<p>A new requirement from Donnybrook-Woodstock PSP:</p> <p>"Lots must front waterways to the satisfaction of Melbourne Water and responsible authority"</p> <p>We might add a disclaimer though relating to the diversion channel as this is not a typical waterway. TBC by MW.</p>
	PSP document	G24	IWM	Amend	<p>Add following text at end of current paragraph:</p> <p>"Where opportunities for IWM are limited in this PSP, development proposals must consider alternatives to address IWM objectives including opportunities in neighbouring PSPs or catchments. Identified opportunities are to be consulted on and agreed with the relevant stakeholders and Melbourne Water."</p>
9	PSP document	3.4.2	High quality public realm	Add new requirement here. This new requirement superseded R24	<p>Add new requirement with similar wording from Croskell PSP:</p> <p>"The final layout, boundaries and design of drainage, flood protection, stormwater quality treatment infrastructure, and associated paths, boardwalks, bridges, and planting must</p> <ul style="list-style-type: none"> •Include appropriate treatments to provide protection for dispersive soils where these are present •Mitigate the risk of erosion from sodic and dispersive soils •Mitigate impacts to groundwater •Be generally in accordance with Plan 6 Water and in accordance with the relevant Development Services Scheme to the satisfaction of Melbourne Water and the responsible authority" <p>Delete R24 in section 3.7.2 as this has been superseded.</p>

Some of the requirements sit outside the DSS - ie culverts under roads and fencing are not included in DSS.

10	PSP document	3.4.2	High quality public realm	Add new	Add new requirement with similar wording from Croskell PSP: "Stormwater conveyance, storage and treatment must be designed in accordance with the relevant Development Services Scheme and generally in accordance with Plan 6 Water, such that: •Overland flow paths and piping within road reserves will be connected and integrated across parcel boundaries. •Melbourne Water and the responsible authority freeboard requirements for overland flow paths will be adequately contained within the road reserves and waterways. •The risk of erosion of sodic and/or dispersive soils is avoided or mitigated •The infrastructure typology (i.e. open waterways, pipes) specified in the relevant Development Services Scheme for each asset are delivered •Any risks from shallow groundwater are avoided or mitigated to the satisfaction of Melbourne Water and the responsible authority. "
11	PSP document	3.4.2	High quality public realm	Add new	Add new requirement with similar wording from Croskell PSP: "Drainage waterways must be designed in accordance with the relevant Development Services Scheme and generally in accordance with Plan 6 Water. Waterways must be delivered to: •Provide safe drainage and flood protection. •Incorporate environmental, cultural and amenity value. •Provide an open drainage system where this typology is specified in the relevant Drainage Services Scheme to the satisfaction of Melbourne Water and the responsible authority."
12	PSP document	R8	High quality public realm	Add new	Add new dot point at the end: "The delivery of the applicable Development Services Scheme"
	PSP document	R13	High quality public realm	Make change	Include DEECA and Melbourne Water for reference to bandicoot culverts (DEECA oversee BCS and culverts likely partly in MW drainage reserve, we also need to review they are outside flood extents). <i>Subdivision and development must provide for the delivery of safe passage culverts shown on Plan 5 Public realm in accordance with Habitat Connectivity Design Standards for Southern Brown Bandicoot (DEECA 2023) to the satisfaction of the responsible authority. DEECA and Melbourne Water</i>
14	PSP document	3.4.2	High quality public realm	Add new	Add new requirement with similar wording from Croskell PSP: "Prior to the completion and handover of any drainage assets shown within the relevant Development Services Scheme, the proponent must obtain any relevant groundwater licenses and/or approvals from the relevant authority."
	PSP document	G26	High quality public realm	Make change	Please include additional sub point: "f) Provide active interfaces encouraging positive interaction with open space areas."
	PSP document	G27	High quality public realm	Make change	Include line to support tree retention in open space. "Alternative locations and configurations for local parks shown on Plan 5 Public Realm may be considered subject to: "f) facilitating the protection of trees and native vegetation patches for retention"
15	PSP document	3.4.2	High quality public realm	Add new	Add new Guideline with similar wording from Croskell PSP: "Drainage assets and public open space areas should be located adjacent to waterways to provide a buffer to development where appropriate to the satisfaction of the responsible authority."

16	PSP document	3.4.2	High quality public realm	Add new	<p>Add new Guideline with similar wording from Croskell PSP:</p> <p>"Development should include integrated water management initiatives to reduce reliance on potable water and increase the utilisation of storm and recycled water contributing to a sustainable urban environment by having regard to relevant water management policies and strategies implemented by the responsible authority.</p> <p>Integrated water management systems should be designed to:</p> <ul style="list-style-type: none"> •Maximise habitat values for local flora and fauna species. •Enable future harvesting and/or treatment and re-use of stormwater. •Recognise and respond to Aboriginal cultural heritage and values. Where possible, harm should be avoided and/or minimised to any identified Aboriginal cultural heritage values"
17	PSP document	3.4.2	High quality public realm	Add new	<p>Add new Guideline with similar wording from Croskell PSP:</p> <p>"The design and layout of roads, road reserves, and public open space should optimise water use efficiency and long-term viability of vegetation, tree canopy and public uses to contribute to a sustainable and green urban environment. This should be achieved using passive watering, and Water Sensitive Urban Design initiatives such as street swales, rain gardens and/or locally treated storm water for irrigation."</p>
18	PSP document	3.4.2	High quality public realm	Add new	<p>Add new Guideline with similar wording from Croskell PSP:</p> <p>"Applications should consider a range of IWM options as indicated in Plan 6 Water. Potential IWM options may include but are not limited to:</p> <ul style="list-style-type: none"> •Recycled water to residential and / or non-residential areas •Stormwater or regional rainwater harvesting for open space irrigation and other users •Rainwater harvesting for commercial/industrial zones •Passive irrigation of street trees from road runoff •Roof irrigation to evaporate stormwater in industrial areas •Dedicated spongy areas in the waterway corridor •Green roofs for commercial buildings."
19	PSP document	3.4.2	High quality public realm	Add new	<p>Add new Guideline with similar wording from Croskell PSP:</p> <p>"Subdivision and development should respond to significant landscape features and existing vegetation in a way that:</p> <ul style="list-style-type: none"> •Retains and protects landscape features and existing vegetation that make a significant positive contribution to place character, amenity, cultural and/or ecological values. •Incorporates the sense and experience of the natural environment into the planned urban character. •Provides for increased provision of tree canopy cover in the public realm over time. •Provides habitat or ecological links connecting areas of retained vegetation to waterways where feasible"
20	PSP document	3.4.2	High quality public realm	Add new Guidelines	<p>Add new Guideline with similar wording from Croskell PSP:</p> <p>"Subdivision should provide for a local street separating development from development services scheme assets, sporting reserves, utility easements and local parks. Where subdivision does not propose a local street separating development, design and layout options should demonstrate:</p> <ol style="list-style-type: none"> a)Lots directly fronting open space and landscape value areas should be set back at least 4.5 metres b)Lots directly fronting open space should allow for vehicular access via a rear laneway <p>A 4 metre wide access way should be provided as the primary point of access from a footpath or shared path with a minimum width of 1.5 metres along the lot frontage</p> <ol style="list-style-type: none"> c)Subdivision design should avoid side or rear fence treatments fronting open space and development services scheme assets d)Subdivision design should maximise opportunities for informal passive surveillance e)Subdivision design should not limit the use of adjacent open space. <p>to the satisfaction of the responsible authority and, where relevant, Melbourne Water"</p>

21	PSP document	Plan 5	##	##	Plan needs to be amended to show SBB corridor connectivity into from Botanic Ridge and out of PSP to UGB (image appears to stop at RBs). Plan needs to be amended to include SBB culverts as identified in WSP report.
22	PSP document	Plan 6	Water	Make change	MW does not support sewerage alignments crossing under wetlands/proposed RBs as there will be potential impacts to the function of these assets as well as maintenance access issues for both MW and SEW. See Fig 3 for clash of locations.
23	PSP document	Plan 6	Water	Clarification	What is the vertical curved green line at "DM-RB-05"?
	PSP document	Plan 6	Water	Clarification	Discussion: Ideally investigation area markation is more clear? Also should have a note of what investigation area intent is ie GW, CH, tree protection
	PSP document	Plan 6	Water	Clarification	Update SBB plan on this as well as Plan 5, i.e. ensure connectivity out of PSP as per BCS.
24	PSP document	All plans	General	Make change	Alignment of local access street (in Casey Fields) should be better optimised to limit the extent that is crossing the waterway. Refer to Fig 4.
25	PSP document	R28	Infrastructure Coordination	Make change	MW reserves the right to amend R28, subject to Croskell PSP requirement that is adopted. In the mean time suggest below: Amend R28 and remove O2 and O3 outfalls: "Development must provide for the delivery of ultimate waterway and drainage infrastructure as detailed in the DSS, including stormwater detention and quality treatment, and outfalls to the satisfaction of Melbourne Water and the responsible authority. Where it can be demonstrated that this is not possible, development proposals must demonstrate how any interim solution adequately manages flow rates, treats stormwater generated from the development (without causing adverse impacts to the other properties within or outside the precinct, the environment, cultural heritage, or other infrastructure, <u>and ensure that there is no risk to the ultimate delivery of the asset</u>), to the satisfaction of Melbourne Water and the responsible authority. An interim solution will not be considered for assets WD1, WD2, WD3, SGC, WD4, O1, O2, O3 . These assets must be delivered in their ultimate form." <u>Development construction and interim solutions must provide waterway and flood protection, and manage environmental, groundwater and cultural heritage risks, and minimise disturbance to any critical infrastructure.</u> <u>"Crossings of waterways must be delivered where shown on Plan 4 Movement Network and must be designed to ensure that flood flows can still be conveyed by the waterway or the overland flow path, to the satisfaction of Melbourne Water"</u>
	PSP document	R8	IWM	Make change	Add following point to R8: "Where identified, development proposals must allow for the implementation of IWM relevant infrastructure and provide sufficient access to construct assets during and/or after development."
	PSP document	G41	IWM	Make change	"Where primary waterway, conservation or recreation functions are not adversely affected, land required for integrated water management initiatives (such as stormwater harvesting <u>and infiltration</u> , aquifer storage and recovery, sewer mining) should be incorporated within the precinct open space system as depicted on Plan 5 Public realm."

Fig 3:

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O2 and O3 to be removed, as access issues will be problematic in ensuring the ultimate is delivered.

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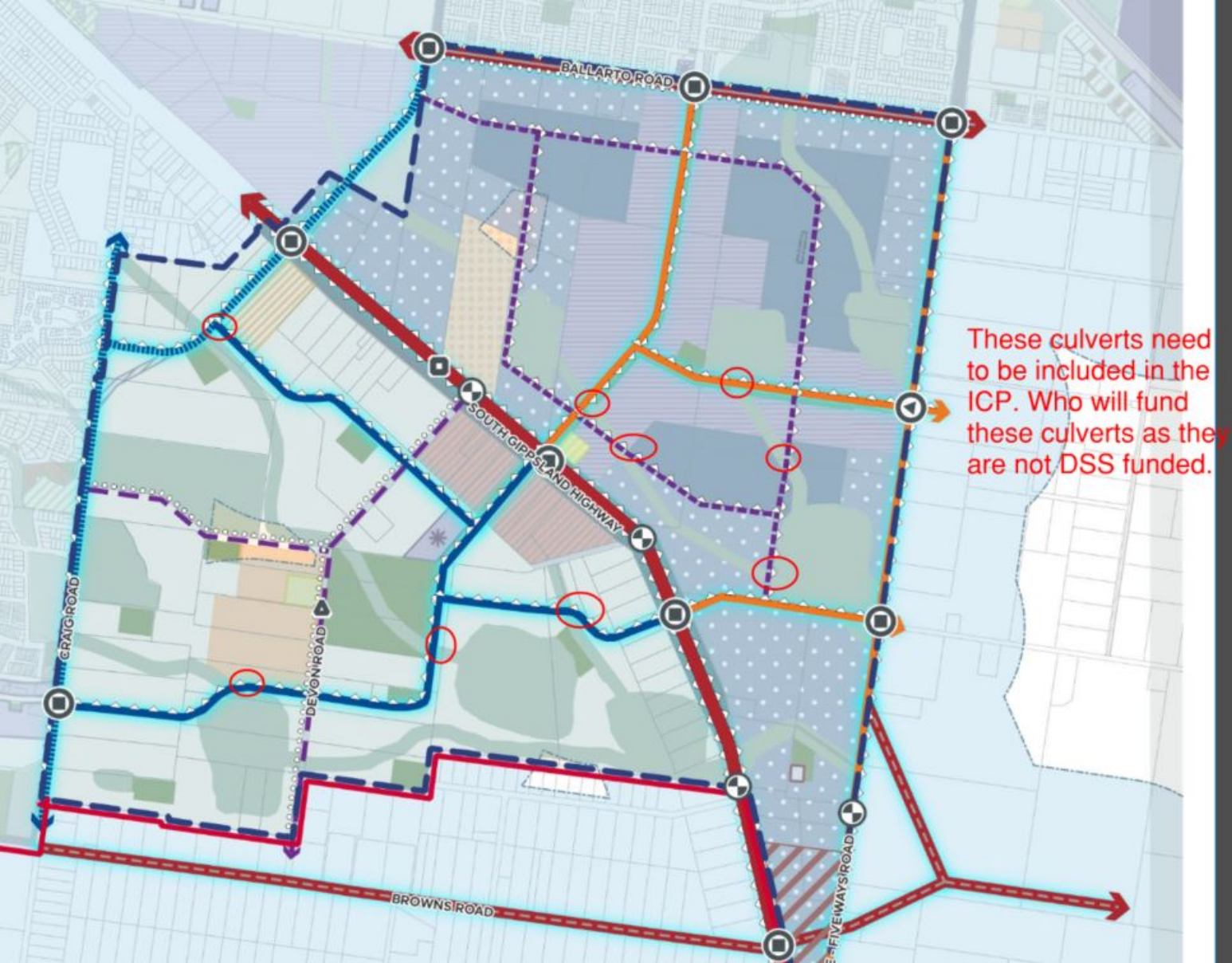
26	PSP document	O28	Staging	Make change	Amend O28 to somewhat similar to Croskell PSP wording: "To sequence the staging of development and the delivery of the relevant Development Service Scheme (DSS) assets to provide flood protection, manage environmental, groundwater and cultural heritage risks, and minimise disturbance to any critical infrastructure."
27	PSP document	R19	Staging	Make change	MW does not support current wording. MW reserves the right to amend R19 to be consistent with the relevant adopted Croskell PSP requirement.
28	PSP document	R21	General	Make change	Amend R21 to: "Utilities and other infrastructure must not cross conservation areas and waterway corridors identified in Plan 5Public realm and Plan 6Water. Where services cannot avoid crossing or being located within a conservation area or waterway corridor, they must be located to avoid disturbance to identified environmental values, <u>significant landform features</u> , <u>cultural heritage sites</u> or minimise impact to the waterway, to the satisfaction of Department of Energy, Environment and Climate Action, the appointed RAP, Melbourne Water and the <u>responsible authority</u> ."
29	PSP document	R24	General	Delete R24	Delete R24 as this has been superseded in Public Realm section.
30	PSP document	R25	General	Delete R25	Delete R24 as this is superseded by R7
31	PSP document	R27	Staging	Remove R27	Remove R27 as it duplication of R28
33	PSP document	R29	General	Remove R29	R29 is a duplication of R21.
34	PSP document	Plan 9	Staging	Make change	MW would like to work further to refine the staging for this PSP. The current proposal may actually hinder the delivery of the ultimate WD1, WD2, WD3, WD4 and O1 as there may be landowners in S2a that have the capacity to deliver these works early on. Plan 9 is unclear. S2b and S1b should be independent from S2a and S1a.
35	PSP document	Plan 10	Funding	Amend plan	Plan 10 should be amended to include culvert crossings. VPA to consider if these new culvert crossings should be ICP funded, as they will not be DSS funded. Refer to Plan 4 comments.
36	PSP document	Table 9	Funding	Amend Table 9	Table 9 to be amended to include funding sources for new culvert crossings. Refer to Plan 4 comments.
37	PSP document	Plan 13	Native vegetation	Amend plan	Plan does not show what vegetation is to be removed
38	PSP document	Plan 14	Bushfire	##	Applied Grassland needs clarification within this document (or review to grassland/scrubland/drainage asset specific). All waterways are assumed revegetated with local EVC (Heathy Woodland or equivalent as provided recently) This vegetation is requires as per MW constructed asset manuals to ensure asset viability and is also a requirement for delivering the SBB BCS
39	PSP document	Appendix 6	Cross sections	Add new cross sections	Add 3 new waterways cross sections as per Croskell PSP: 1. waterway with Southern Brown Bandicoot integration. 2. typical waterway without SBB integration. 3. diversion channel Each waterway typology will have different treatments therefore giving clear indication for development as what is expected.
40	PSP document	All plans	General	Need to amend plans	Plans to be amended to show an outfall reserve from this RB "DM-RB-05"

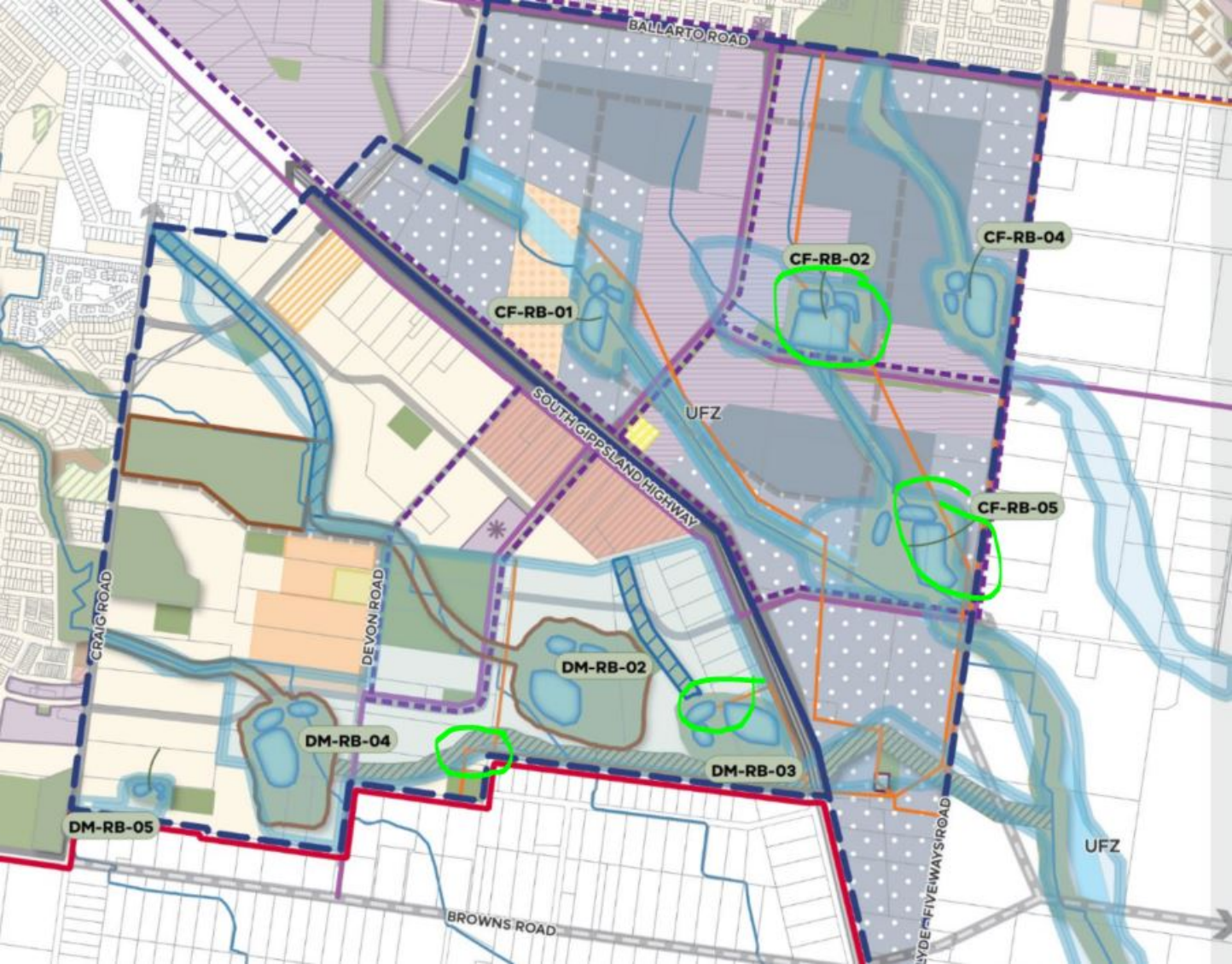
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41	PSP document	General	Cultural heritage	Response to C20	See MW's cover letter relating to Cultural heritage.
42	PSP document	General	SBB/Habitat retention	##	See MW's cover letter relating to SBB/Habitat protection.
43	PSP document	General	drainage asset change	potential change to PSP plans	Melbourne Water will need to review DM-RB-05 asset location. Optimal location may be further south to abut the urban growth boundary, as MW would not support any development between the RB and the UG boundary. MW to get back to the VPA with this adjustment.
44	PSP document	3.7.2	Infrastructure Coordination	Additional guideline	Requirements for utility installation should also consider early works that have the potential to impact on cultural heritage values (such as geotechnical works) and where possible relocate these away from waterways, and other culturally sensitive landforms.
45	PSP document	General	Heritage	Query	There does not appear to be any heritage or Aboriginal heritage sensitivity maps included - not sure if this is by design? It may help add context to MWs flagged DSS investigation area and context to sensitivity delivering assets particularly in Devon Meadows precinct.
46	PSP document	Plan 10 and Plan 13	SBB/Habitat retention	potential change to PSP plans	MW recommendation to consider co-location of open space Local Parks to marry up where the trees and patches of vegetation are marked to be retained. This appears to occur only occasionally. This would provide a greater SBB habitat opportunity to increase extents of habitat beyond waterway corridors and provide existing high quality habitat rather than newly planted habitat in waterways. Additionally it would be ideal to include another point under R10, noting retained vegetation "should aim to provide unobstructed connectivity to waterway/SBB corridors, particularly avoiding roads where possible."
47	PSP Document	##	##	Add new	Add new requirement borrowed from Officer South Employment PSP: "Utilities must be placed outside of waterway corridors identified in Plan XX. Where services cannot avoid crossing or being located within a waterway corridor, they must consolidate utilities into dedicated service corridors where possible, and be located to avoid disturbance to existing waterway values, native vegetation, significant landform features, heritage sites and habitats, to the satisfaction of DEECA, Melbourne Water, the appointed RAP and the responsibility authority."
48	PSP Document	##	##	Add new	Add new requirement from gazetted Officer South PSP: "Reinstatement of creeks, waterways, water bodies and other water features must be undertaken with indigenous species, to the satisfaction of the relevant manager of the creeks, waterways, water bodies and other water features, in accordance with a landscape plan prepared to the satisfaction of the responsible authority and taking into account any comments from Melbourne Water and the appointed RAP . "
49	PSP Document	##	High Quality Public Realm	Add new	Add new requirement from Croskell PSP: "A landscape plan must specify tree species which are suitable to the local climate and soil conditions, to the satisfaction of the responsible authority and – when relating to land adjacent to waterways – Melbourne Water"

55	Infrastructure & Development Staging Background Report	Page 1	Staging	Justification of staging is to be reviewed and discussed further between MW and VPA	<p>The report specifies that the main driver for staging is to ensure the early delivery of the DSS infrastructure.</p> <p>In the context of Devon Meadows PSP, the diversion channel PAO (WD1, WD2, WD3, WD4, O1) will ensure the early transfer of private land to Melbourne Water. The current staging plan may actually hinder the early delivery of the diversion channel as there may be developers in stage S2a that may have the capacity/appetite to deliver this asset. The PAO will ensure that they have access to undertake these works.</p> <p>MW to work further with the VPA to revise the staging approach further.</p>
56		R10			R10 tree retention needs resolution with Council and VPA - in particular, in relation to drainage assets and PAO (which needs a different level of consideration, given the lack of flexibility in extent).
57	Explanatory Report		Planning controls	Agency validation comments	<p>"The proposal to rezone the Urban Floodway Zone to Urban Growth Zone, Schedule 15 is not appropriate until Melbourne Water infrastructure is fully implemented</p> <p>Delete reference to rezoning of Urban Floodway Zone."</p>
58	Zoning map		Planning controls	Agency validation comments	<p>"To retain identification of land subject to flooding while Melbourne Water infrastructure is yet to be fully implemented, the zoning map is to retain Urban Floodway Zone.</p> <p>Amend zoning map to retain existing Urban Floodway Zone."</p>
59	PSP Documents				No mention of drainage PAO in PSP







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