

Amendment C295case to the Casey Planning Scheme

CASEY FIELDS SOUTH (EMPLOYMENT)
AND DEVON MEADOWS PRECINCT
STRUCTURE PLAN

Casey City Council Submission

Endorsed by Council: 20 May 2025

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Introduction

This submission is Casey City Council's submission to Amendment C295case to the *Casey Planning Scheme (amendment)* incorporating the *Casey Fields South (Employment) and Devon Meadows Precinct Structure Plan (draft PSP)*, which was publicly exhibited in draft form pursuant to a non-statutory process in March 2025.

Council is generally supportive of the draft PSP; however, requires the resolution of the following key items during this consultation phase.

This submission comprises two (2) parts:

1. Key Items 1-9 inclusive addressing Council's headline issues; and
2. Supplementary Information Item 1 – Additional Submission Items.

Key Item 1 – Council as Lead Agency for Intersection Projects

1. Clyde-Five Ways Road and the South Gippsland Highway are declared arterial roads.
2. The Department of Transport and Planning (**DTP**) is the coordinating road authority for these roads under the *Road Management Act* 2004.
3. Notwithstanding the above, Table 9 – Precinct infrastructure and Plan 10 – Precinct Infrastructure Plan of the draft PSP identify Casey Council as the lead agency for the delivery of the following eight (8) intersection projects located on Clyde-Five Ways Road and the South Gippsland Highway:
 - (a) CFS-IN-03: Intersection: Ballarto Road / Clyde-Five Ways Road;
 - (b) CFS-IN-04: Intersection: South Gippsland Highway / Casey Fields Boulevard extension;
 - (c) CFS-IN-05: Intersection: South Gippsland Highway / Central connector street;
 - (d) CFS-IN-06: Intersection: Clyde-Five Ways Road / Central connector street;
 - (e) CFS-IN-08: Intersection: South Gippsland Highway / Southern connector street;
 - (f) CFS-IN-09: Intersection: Clyde-Five Ways Road / Moores Road extension;
 - (g) CFS-IN-10: Intersection: South Gippsland Highway / Clyde-Five Ways Road / Browns Road; and
 - (h) CFS-POS-01: Devon Road pedestrian signals (**relevant intersection projects**).
4. Consistent with Council's submissions during the recent public exhibition of, and subsequent VPA Projects Standing Advisory Committee hearing for, Amendment C296case to the *Casey Planning Scheme* incorporating the *Croskell (Employment) Precinct Structure Plan* and *Croskell (Employment) Infrastructure Contributions Plan (Amendment C296case)*, Council maintains that the DTP should be lead agency for the delivery of the relevant intersection projects.
5. Council's submissions during these processes provided the background to Council's position.

6. Very simply, these submissions articulated:
 - (a) the financial management obligations imposed on Council by Victorian Government legislation; and
 - (b) the financial risks to Council of delivering a project where other parties, such as the DTP and service authorities, are in control of the approval process for that project.
7. The identification of the DTP as the lead agency for the delivery of the relevant intersection projects reflects DTP being the approval authority for these projects.
8. In the event that the Minister for Planning (**Minister**) approves a PSP identifying Casey Council as the lead agency for the delivery of the relevant intersection projects, Council will:
 - (a) not deliver the relevant intersection projects itself;
 - (b) require or otherwise encourage developers to deliver the relevant intersection projects;
 - (c) enter into agreements with developers to provide the monetary component of infrastructure contributions collected for a relevant intersection project in the *Casey Fields South (Employment) and Devon Meadows Infrastructure Contributions Plan (ICP)* to the maximum amount for that project specified in the ICP.

Key Item 2 – Waterways and Drainage, including Staging

Implementation of strategic policy

9. The following Victorian Government strategic policy must inform the draft PSP:
 - (a) the *South East Growth Corridor Plan* (2012) identifies:
 - (i) Casey Fields South (Employment) (**Casey Fields South**) as “Industrial”; and
 - (ii) Devon Meadows as “Urban – Land Use to be determined”, which has been subsequently resolved as residential;
 - (b) the *Melbourne Industrial and Commercial Land Use Plan* (2020) identifies Casey Fields South as “Regionally Significant Industrial Land – Future”; and
 - (c) the *Plan for Victoria* (2025) identifies that Casey’s greenfield areas must accommodate an additional 58,500 dwellings by 2051.

10. The development of Casey Fields South provides a unique opportunity to realise Strategic Outcome 4 of the adopted City of Casey Draft Council Plan 2025 – 2029 focussed on attracting new businesses and promoting local employment opportunities for our residents:

Thriving Local Economy

It is easy to do business in Casey through programs that support the local economy, attract new businesses and promote local employment.

(Council's emphasis)

11. The draft PSP fails to appropriately implement Victorian Government strategic policy for Casey Fields South, noting:
- (a) Section 2.1 – PSP vision fails to recognise that Casey Fields South is a regionally significant industrial area;
 - (b) Section 2.2 – PSP purpose fails to recognise that Casey Fields South is a regionally significant industrial area; and
 - (c) Table 7 – Place-based objectives – Connect people to jobs and higher order services fails to include an appropriate objective to maximise net developable area for the provision of employment opportunities at Casey Fields South.
12. The outcomes of the draft PSP are expressed as the vision, purpose and place-based plan.
13. A line of sight to this strategic policy throughout the outcomes of the draft PSP is essential because any planning permit issued must implement these outcomes.
14. Council requests that the VPA amend the draft PSP to appropriately implement and realise the strategic policy for Casey Fields South by:
- (a) amending the PSP vision and purpose to recognise that Casey Fields South is a regionally significant industrial area; and
 - (b) incorporating a new objective to maximise net developable area for the provision of employment opportunities at Casey Fields South.
15. We refer to the PSP vision, purpose and Objective O14 of the Final Day Version of the Croskell (Employment) PSP tabled by the VPA at the VPA Projects Standing Advisory Committee hearing for Amendment C296case on 2 April 2025, which provides a precedent here.

16. The development of Devon Meadows must make a proportionate contribution to the achievement of Casey's greenfield dwelling target of an additional 58,500 dwellings by 2051 set by the Plan for Victoria.
17. To this end, Council requests that the VPA:
 - (a) amend the PSP vision and purpose to recognise the role of Devon Meadows in the delivery of Casey's greenfield dwelling target set by the Plan for Victoria; and
 - (b) incorporate a new objective to maximise net developable area for the provision of housing at Devon Meadows.

Land required for waterways and drainage network

18. The failure of the draft PSP to appropriately implement Victorian Government strategic policy is most practically demonstrated in the area shown as:
 - (a) "other uncredited open space" on Plan 2 – Place Based Plan; and
 - (b) "waterways and drainage" on Plan 6 – Water (**waterways and drainage network**).
19. Council is not satisfied that the location of, and the extent of land required for, the waterways and drainage network achieves an optimal development outcome that will deliver:
 - (a) a regionally significant industrial employment precinct; and
 - (b) a residential precinct that makes a proportionate contribution to Casey's greenfield dwelling target.
20. Firstly, the waterways and drainage network does not integrate with, or leverage, existing water infrastructure located within the precinct, which is discussed further below.
21. Secondly, Council foresees that the waterways and drainage network will detrimentally impact the development of multiple parcels where land required for the waterways and drainage network fragments and/or significantly constrains a parcel, rendering the parcel unviable for development.
22. In particular, the irregular shaped waterway and drainage network shown on Parcels DM-49, DM-56, DM-75, DM-78, DM-81 and DM-82 is likely to render significant parts of these parcels undevelopable. Council is concerned with this proposal, noting that the viable development of these parcels is critical to the provision of the enabling drainage infrastructure required to catalyse the development of the wider precinct (refer Plan 9 – Infrastructure and Development Staging).

23. Council officers have provided recommended amendments to the Concept Drainage Strategy Plan prepared by GHD to Melbourne Water, which are intended to optimise the waterways and drainage network and reduce constraints on multiple parcels, including:
- (a) increasing the use of piping to replace open drains;
 - (b) remove GHD Ref: DM2 (PSP Plan 6 Ref: DM-RB-04) and direct the runoff to GHD Ref: DM3/DM4 (PSP Ref: DM-RB-02 and DM-RB-03); and
 - (c) combine GHD Ref: DM3 and DM4 (PSP Ref: DM-RB-02 and DM-RB-03) (**Figure 1**).

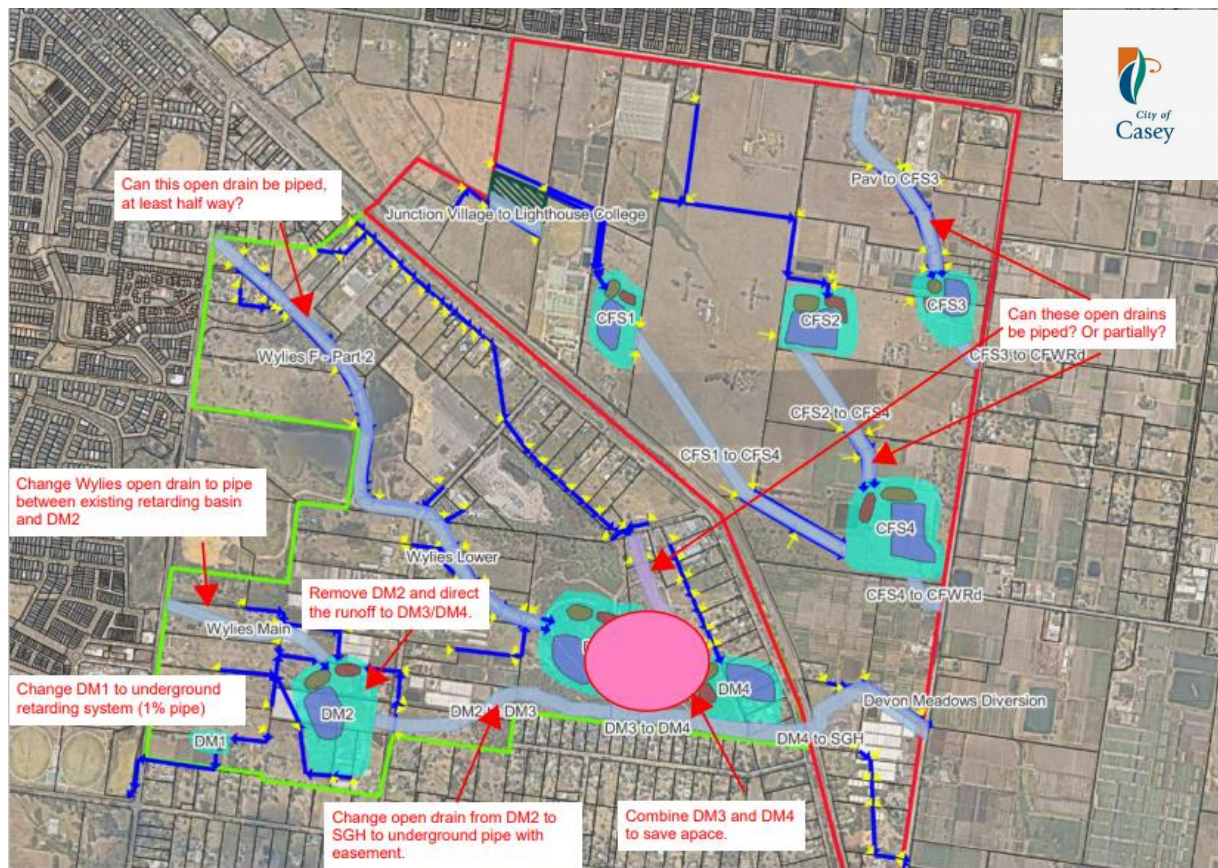


Figure 1 – Recommended amendments to Concept Drainage Strategy Plan

24. Other developer stakeholders are actively contributing to the development of alternate concept drainage strategy plan options, some of which are informed by technical studies.
25. In their submission dated 31 March 2025, MAB Property Developments Pty Ltd (**MAB**) identified “...a significant opportunity to reduce and modify the proposed extent of constructed waterways in the DMPSP ... and ultimately deliver a more cohesive urban structure for the future residential community”.

26. The MAB alternate concept drainage strategy plan option relies on:
- (a) existing underutilised water infrastructure like the Melbourne Water retarding basin located at 40-42 Craig Road;
 - (b) underground piping of stormwater instead of constructed waterways in the north-west of Devon Meadows; and
 - (c) a realignment of the south-western waterway alongside existing significant vegetation at the southern corner of the local convenience centre (**Figure 2**).



Figure 2 – MAB alternate concept drainage strategy plan option

27. In submissions on behalf of Galileo Clyde Fiveways Pty Ltd and Buncha Flowers Pty Ltd dated 31 March 2025, KLM Spatial submitted an alternate concept drainage strategy plan option for Casey Fields South which achieves an approximate 40% reduction in wetland area and requires two, rather than three outfalls (**Figure 3**).

28. Council sees merit in further exploring the technical feasibility of both alternate concept drainage strategy plan options.
29. Council encourages Melbourne Water and the VPA to continue to collaborate with developer stakeholders to optimise the concept drainage strategy plan design to maximise the strategic development potential of the precinct.



Figure 3 – KLM Spatial alternate concept drainage strategy plan option

Staging

30. Council submits that the staging of infrastructure and development shown on Plan 9 of the draft PSP (**staging plan**) unnecessarily constrains development by:
 - (a) creating large drainage infrastructure stages servicing multiple upstream catchments; and
 - (b) requiring the delivery of multiple ultimate assets within each drainage infrastructure stage before the commencement of development or the issue of a statement of compliance for a plan of subdivision (refer Requirement R27).

31. Council accepts Objective O31 of the draft PSP to ensure development is staged in an orderly manner consistent with the delivery of infrastructure.
32. However, the staging plan must also facilitate not stymie the development of the precinct through onerous requirements for the delivery of multiple ultimate assets.
33. In **Figure 4**, Council water planning officers recommend amendments to the staging plan that remain consistent with Objective O31 but reduce the onerous requirements for the delivery of multiple ultimate assets and, therefore, facilitate development by:
 - (a) increasing the number of stages from four to six;
 - (b) reducing the ultimate assets required to be delivered within each stage; and
 - (c) allowing the independent development of stages.

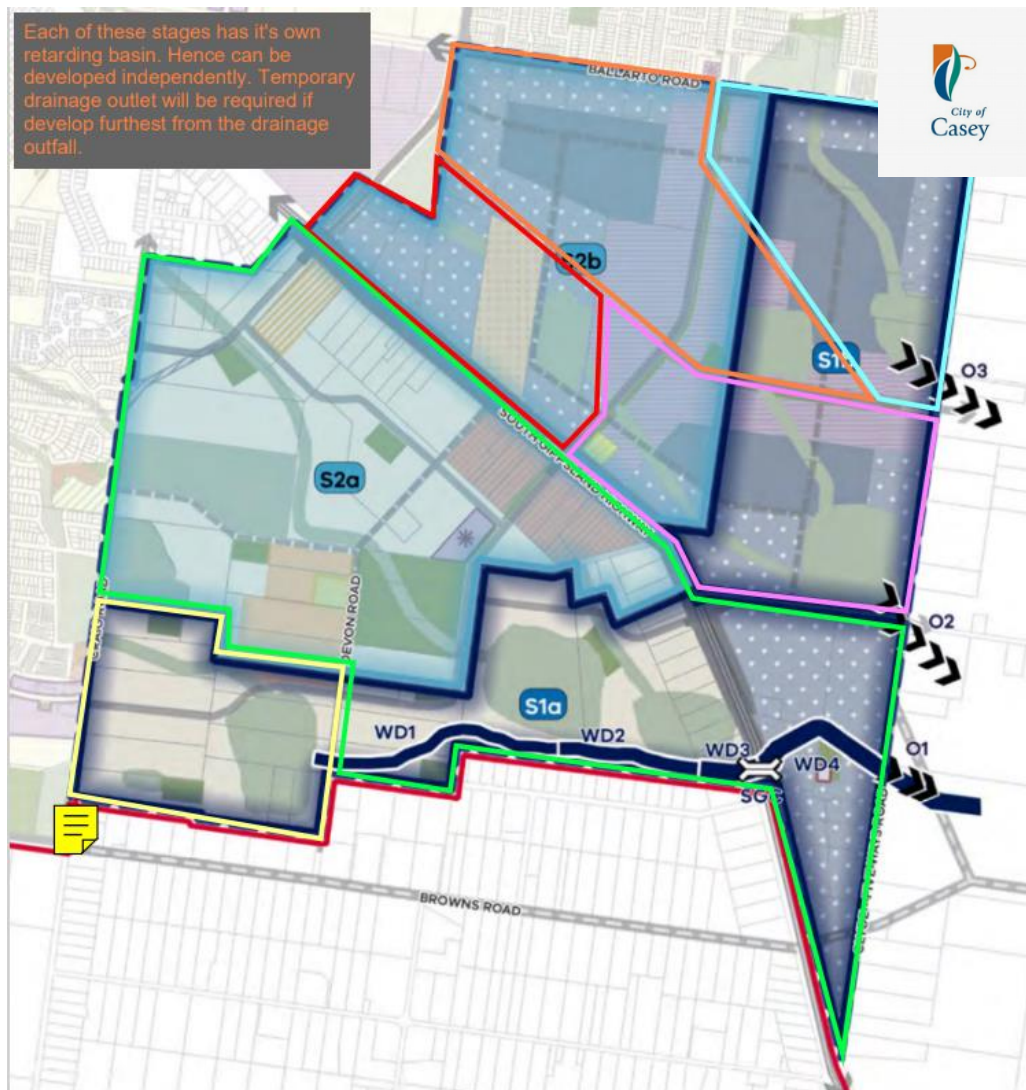


Figure 4 – Recommended amendments to Staging Plan

Key Item 3 – Open Space

34. Council's submissions following relate to the local sports reserve (SR) and local parks – residential and employment (LP) identified on Plan 5 – Public Realm of the draft PSP.

Local sports reserve

35. Table 6 – Open space delivery of the draft PSP requires the delivery of Project ID: DM-SR-01, described as the purchase of 8.17ha of land and construction of sports fields, hard courts and a multi-purpose pavilion.
36. The *Community Infrastructure and Open Space Needs Assessment – Casey Fields and Devon Meadows Precincts* prepared by SGS dated February 2023 (**the assessment**) reviewed existing open space within an 800m radius of Devon Meadows and identifies three recreation reserves:
- (a) Booring Recreation Reserve (item 5 on Figure 4 of the assessment);
 - (b) Glover Recreation Reserve (item 1 on Figure 4); and
 - (c) Junction Village Recreation Reserve (item 8 on Figure 4).
37. Page 56 of the assessment specifically notes:

As noted in the existing infrastructure, there is a good supply of open space at the western border of Devon Meadows (Booring and Junction Village Recreation Reserves). There is also an active open space located to the south of the Precinct (Glover Recreation Reserve).

Council's additions

38. The Booring Recreation Reserve is located on the common boundary of the Botanic Ridge and Devon Meadows precincts.
39. The Botanic Ridge PSP intentionally located this recreation reserve on the precinct boundary, anticipating that the recreation reserve would service a future residential precinct at Devon Meadows to the east.
40. **Figure 5** draws an 800m walkable distance from the Booring, Glover and Junction Village Recreation Reserves, confirming the above statement made in the assessment that the west and south of Devon Meadows is well-served by local sports reserves.



Figure 5 – 800m walkable distance from existing recreation reserves (Casey IntraMaps)

41. In accordance with Performance Target T11 of the *Precinct Structure Planning Guidelines: New Communities in Victoria, October 2021* prepared by the VPA (**PSP Guidelines**), the assessment applies the 5-7% multiplier of the net developable area of Devon Meadows to inform the recommendation for the provision of a 1 × 2 multi-use ovals plus, pavilion, and playground at Devon Meadows.
42. The draft PSP adopts the recommendation of the assessment.
43. Council accepts that Performance Target T11 does not have regard to existing sports reserves.
44. However, Council submits that “tick-box” compliance with this performance target alone is not determinative of the merits of the sports reserve proposed by the VPA.

Financial implications

45. Pursuant to Table 1 of Annexure 1 – Metropolitan Greenfield Growth Areas to the *Ministerial Direction on the Preparation and Content of Infrastructure Contributions Plans* gazetted on 11 April 2025, only residential development in Devon Meadows can fund community and recreation construction projects in the precinct.
46. **Table 1** below details the ICP Benchmark Infrastructure Costs (**BIC**) for the community and recreation construction projects in the precinct.

Table 1 – Benchmark Infrastructure Costs (BIC) for the construction of community and recreation construction projects

BIC Item	Description	Estimate P90 (2024/25)
38	Level 2 (Community) Facility	\$11,242,831
41	Sports Pavilion 3 playing areas	\$3,466,792
43	Sports and recreation facility 8 to 10 hectare site	\$13,039,821
Total		\$27,749,444

47. Notwithstanding the amendments made to the draft PSP on 7 March 2025 during the public exhibition period, conflict remains between the Devon Meadows net developable area stated in the following, which requires resolution by the VPA:
- (a) Figure 2 – Devon Meadows PSP performance summary (net developable area: 147ha);
 - (b) Table 10 – Summary land use budget of the draft PSP (146.87ha) and
 - (c) Table 12 – Devon Meadows Property-specific land use budget (145.07ha).
48. Applying the Devon Meadows net developable area of 146.87ha stated in Table 10, the standard levy will collect only \$16,913,003 for community and recreation construction projects.
49. Therefore, the draft PSP presents Casey Council with a significant unfunded liability of at least \$11,727,689 for community and recreation construction projects.
50. Council emphasises the words “at least” for a reason.
51. The ICP Benchmark Infrastructure Costs for Project ID: DM-SR-01 cited above assume the construction of the benchmark scope for Benchmark Item 43.
52. However, the VPA has not proposed the benchmark scope for Benchmark Item 43, rather a bespoke supplementary level sports reserve design comprising of a waterway corridor bisecting an 8 to 10 hectare sports and recreation facility that is to be funded by a standard levy.
53. The VPA’s proposal for a bespoke supplementary level sports reserve design imposes additional unfunded liabilities on Council that are not yet understood.

54. These additional unfunded liabilities will comprise of the following additional costs:
- (a) site establishment and preparation costs for each part of the sports reserve separated by the waterway corridor, which is inherently inefficient;
 - (b) the construction of secondary access roads, car parks and sports pavilions for each part of the sports reserve, and, presumably, a pedestrian bridge connection between the playing fields separated by the waterway corridor; and
 - (c) Southern Brown Bandicoot movement corridors within the waterway corridor, which may potentially significantly impact the adjoining sports reserve layout and/or require bespoke design solutions.
55. Council refuses to accept this proposition and cannot assure the delivery of this project.
56. Council must be open and transparent with the future Devon Meadows community about the significant unfunded liability for the construction of the sports reserve to manage the legitimate expectations of this community that the sports reserve will be delivered.
57. The proposed local sports reserve undermines Council's financial sustainability by imposing an unknown unfunded liability in excess of \$11.7M that must be funded by external grants or rates revenue.
58. Opportunities for external grant funding are limited in the current fiscal policy environment.
59. The use of rates revenue is constrained by Victorian Government rate capping and must be balanced against competing organisational priorities, including asset renewal.
60. Therefore, Council requests the **deletion** of the local sports reserve identified as Project ID: DM-SR-01.

Local parks

61. With Council's advocacy for the deletion of the local sports reserve, Council officers have developed an optimised open space network that ensures a more equitable distribution of local parks across the precinct.
62. Performance Targets T11 and T12 of the PSP Guidelines and Council's *Open Space Strategy* have guided the development of the optimised open space network.

63. Larger strategically located local parks would offer significant benefits to the future community and Council, including:
- (a) enhanced amenities and increased embellishments compared to what can be delivered in smaller local parks;
 - (b) increased activation:
 - (i) centralised spaces foster a great sense of community while offering social interaction and engagement;
 - (ii) improved safety; and
 - (c) a higher order of maintenance due to higher use.
64. Table 6 and Plan 5 of the PSP directs the areas and preferred location of future local parks.
65. Council's proposed amendments to Table 6 and Plan 5 are detailed in **Table 2** below:

Table 2 – Council's proposed amendments to the local park network

Project ID	Proposed amendments
CF-LP-01	Remove the four linear connections.
CF-LP-02	Linear connections should not be classified as credited public open space (POS) because they cannot be activated or embellished as POS.
CF-LP-03	Classification as POS does meet the intent of POS and should be removed.
CF-LP-04	<p>A shared path in the adjoining road reserve can deliver the intended function of the linear connection.</p> <p>The location of linear connections on key movement networks does not meet the objective of Clause 19.02-6S of the Casey Planning Scheme.</p> <p>Replace the four linear connections with three local parks.</p> <p>Local parks of 0.60ha or higher would provide spaces for employees to utilise during breaks and before and after work.</p> <p>The provision of local parks is crucial as the built form will not provide spaces for employees to immerse themselves with nature.</p> <p>Three local parks are proposed within the areas bound by major roads (that is, South Gippsland Highway, Ballarto Road and the north-south and east-</p>

Project ID	Proposed amendments
	west connector streets, which are significant barriers to access).
DM-LP-01	Consolidate with DM-LP-02.
DM-LP-02	Consolidate with DM-LP-01. Consolidate the two local parks to provide one 1.5ha local park.
DM-LP-03	Remove local park. Linear connections should not be classified as credited POS.
DM-LP-04	Consolidate with DM-LP-05.
DM-LP-05	Consolidate with DM-LP-04. Consolidate the two local parks to provide a 2ha district park close to the proposed government school, which increases activation.
DM-LP-06	Increase in size given the removal in other locations.
DM-LP-07	Remove.
DM-LP-08	Relocate local park adjacent to a waterway, which can be embellished adjacent to a waterway that can only include a path/trail and seating above Q ₁₀₀ flood levels.
DM-LP-09	Reduce in size to 0.80ha

66. **Table 3** below details Council's optimised open space network to replace Table 6 of the PSP.

Table 3 – Council's optimised open space network

Project ID	Type	Area (ha)	Approximate location
DM-LP-01	Passive open space (local park)	1.50	North-west
DM-LP-02	Passive open space (local park)	1.50	Central west
DM-LP-03	Passive open space (local park)	1.00	South-west adjoining retarding basin
DM-LP-04	Passive open space (district park)	2.00	Central adjacent to government schools
DM-LP-05	Passive open space (local park)	0.80	South adjacent to waterway
DM-LP-06	Passive open space (local park)	1.00	South-east adjoining retarding basin
CF-LP-07	Passive open space (local park)	0.80	Central west
CF-LP-08	Passive open space (local park)	0.60	Central east adjacent to waterway
CF-LP-09	Passive open space (local park)	0.60	South-east adjacent to waterway
Total		9.80	

67. **Figure 6** below provides a visual representation of Council's optimised open space network detailed in Table 3, with the red circles indicating a 400m safe walkable distance from each local park.

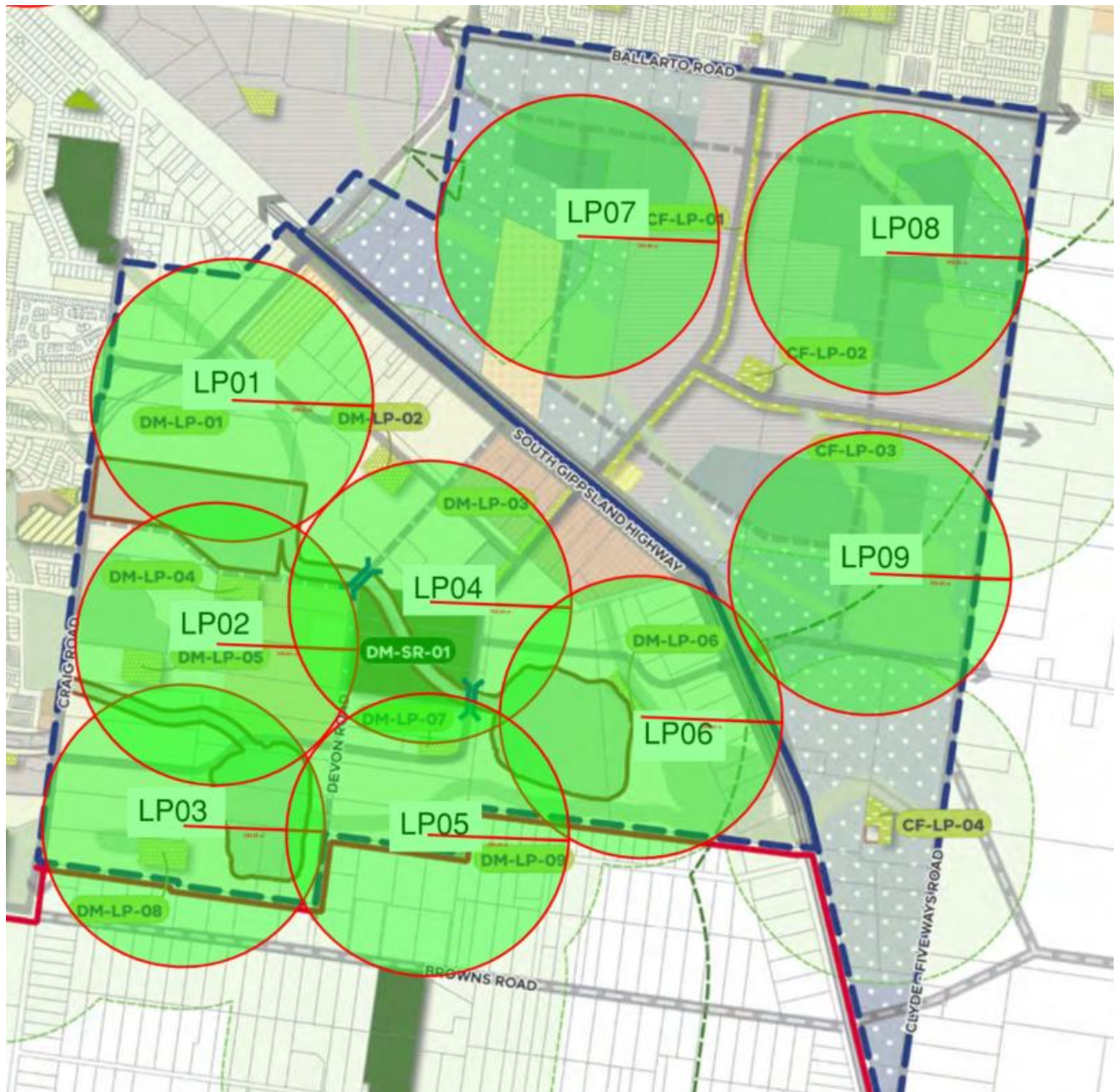


Figure 6 – Council's optimised open space network

Assessment against relevant performance targets

68. Performance Target T11 of the PSP Guidelines states:

The open space network should seek to meet the following minimum targets:

- *Within residential areas (including activity centres):*
 - *10% of net developable area for local parks and sports field reserves*
 - *3-5% of net developable area set aside for local parks*
 - *5-7% of net developable area set aside for sports field reserves.*
- *Within dedicated employment and/ or economic activity areas, 2% of the net developable area for local parks.*

(Council's emphasis)

69. Applying the Devon Meadows net developable area of 146.87ha stated in Table 10:

- (a) Council's optimised local park network will set aside 7.80ha for local parks (5.3% net developable area), which exceeds the 3-5% performance target for local parks within residential areas;
- (b) on the 10% target of net developable area for local parks and sports field reserves:
 - (i) a majority of Devon Meadows is located within an 800m safe walkable distance of an existing sports field reserve (Figure 5);
 - (ii) whilst not classified as open space for the purposes of addressing the performance target, the extensive waterways and drainage network will contribute additional publicly accessible open space to achieve 10% of net developable area in the absence of a proposed sports field reserve.

70. Applying the Casey Fields South net developable area of 205.12ha:

- (a) Council's optimised local park network will set aside 2ha for local parks (0.97% net developable area), which does not meet the performance target;
- (b) Council's optimised local park network is acceptable because:
 - (i) it provides a more functional network than the draft PSP network because it can be activated and embellished;
 - (ii) whilst not classified as open space for the purposes of addressing the performance target, the extensive waterways and drainage network will contribute additional publicly accessible open space to achieve 2% of net developable area.

71. Performance Target T12 of the PSP Guidelines states:

Open space and sports reserves should be located to meet the following distribution targets:

- *A sports reserve or open space larger than 1 hectare within an 800m safe walkable distance of each dwelling*
- *A local park within a 400m safe walkable distance of each dwelling.*

(Council's emphasis)

72. Performance Target T12 applies to Devon Meadows only.

73. Figures 5 and 6 demonstrate Council's optimised open space network provides a superior response to the draft PSP that complies with all elements of Performance Target T12 as follows:

- (a) those dwellings located within the 800m safe walkable distance of an existing sports reserve shown on Figure 5 are located within an 800m safe walkable distance of a sports reserve and open space larger than 1ha shown on Figure 6;
- (b) all dwellings are located within an 800m safe walkable distance of an open space larger than 1ha shown on Figure 6;
- (c) all dwellings are located within a 400m safe walkable distance of a local park on Figure 6.

74. The drafting of the performance targets recognise that the achievement of these targets is not always possible.

75. In such a small and constrained precinct like Devon Meadows, the achievement of all the performance targets of the PSP Guidelines is simply not possible.
76. Council's optimised open space network leverages a mix of existing local sports reserves and larger local parks that:
- (a) balances:
 - (i) the achievement of Performance Targets T11 and T12 of the PSP Guidelines;
 - (ii) financially sustainable infrastructure delivery; and
 - (b) provides greater assurance of delivery than the unfunded local sports reserve proposed by the VPA.

Key Item 4 – Community Facility

Provision

77. Section 6.4 of the assessment recommends a Level 2 community facility for Devon Meadows:

Level 2 community facility

This higher level community facility would include an integrated early years services including the following:

- 4 x kindergarten rooms
- 2 x small meeting rooms for general community use including playgroups
- 1 x flexible meeting room to accommodate outreach maternal and child health services

78. The draft PSP adopts the recommendation of the assessment.
79. Table 9 and Plan 10 of the draft PSP identifies the purchase of land and construction of a Level 2 community centre (PIP Ref No.: DM-CI-01).
80. Firstly, there is conflict between the *Casey Fields South (Employment) and Devon Meadows Precinct Structure Plan; Bunurong Country; Background Report* dated February 2025 (**background report**) and draft PSP around the level of community centre to be provided.

81. Section 4.6.5 of the background report states:

The PSP includes provision for one Level 1 community centre...

(Council's emphasis)

82. The VPA must clarify its requirements for the community centre.
83. In previous written correspondence to the VPA dated 28 January 2025, Council confirmed its requirements for a Level 1 community centre on a 0.60ha parcel co-located with the proposed government primary school (P6).
84. Council maintains this position requiring a Level 1 community centre.
85. **Table 4** compares the ICP benchmark scopes for Level 1 and 2 community facilities, with a focus on kindergarten and maternal and child health consulting service provision.

Table 4 – ICP benchmark scope for level 1 and 2 community facilities

	Unit	Level 1	Level 2
Benchmark Infrastructure Cost item	n/a	37	38
Kindergarten Facility Two kindergarten rooms to accommodate 99 licensed places, including children's toilets and amenities, storage space, office, staff room and staff toilets and amenities display and circulation space	m ²	750	750
Extra 33-place kindergarten room / multipurpose meeting space	m ²	150	150
Maternal and child health consulting facility (two consulting rooms plus waiting space / program room)	m ²	100	100

86. Table 4 confirms that there is no difference in kindergarten and maternal and child health consulting service provision between a Level 1 and 2 community facility, noting both level facilities provide:
- (a) two (2) kindergarten rooms to accommodate 99 licensed places (750m²);
 - (b) an extra 33-place kindergarten room (150m²); and
 - (c) two (2) maternal and child health consulting rooms plus waiting space / program room (100m²).
87. Therefore, Council's advocacy for a Level 1 community centre will have no impact on future service provision to the community.
88. Council requests the amendment of the draft PSP as follows:
- (a) amend PIP Ref No.: DM-CI-01 in Table 9 to require a Level 1 Community Centre;
 - (b) amend ICP community facilities in Table 10 to require 0.60ha;
 - (c) make all other necessary consequential amendments to the draft PSP, including Table 12 – Devon Meadows Property-specific land use budget and mapping.

Location

89. Figure 6 of the *Devon Meadows and Casey Fields South (Employment) PSP Odour, Dust, and Noise Assessment* prepared by GHD (**odour, dust and noise assessment**) identifies part of the land for the community facility located within the S-Factor separation distance for the South Gippsland Eggs farm located at 100 Devon Road, Devon Meadows (**Figure 7**).

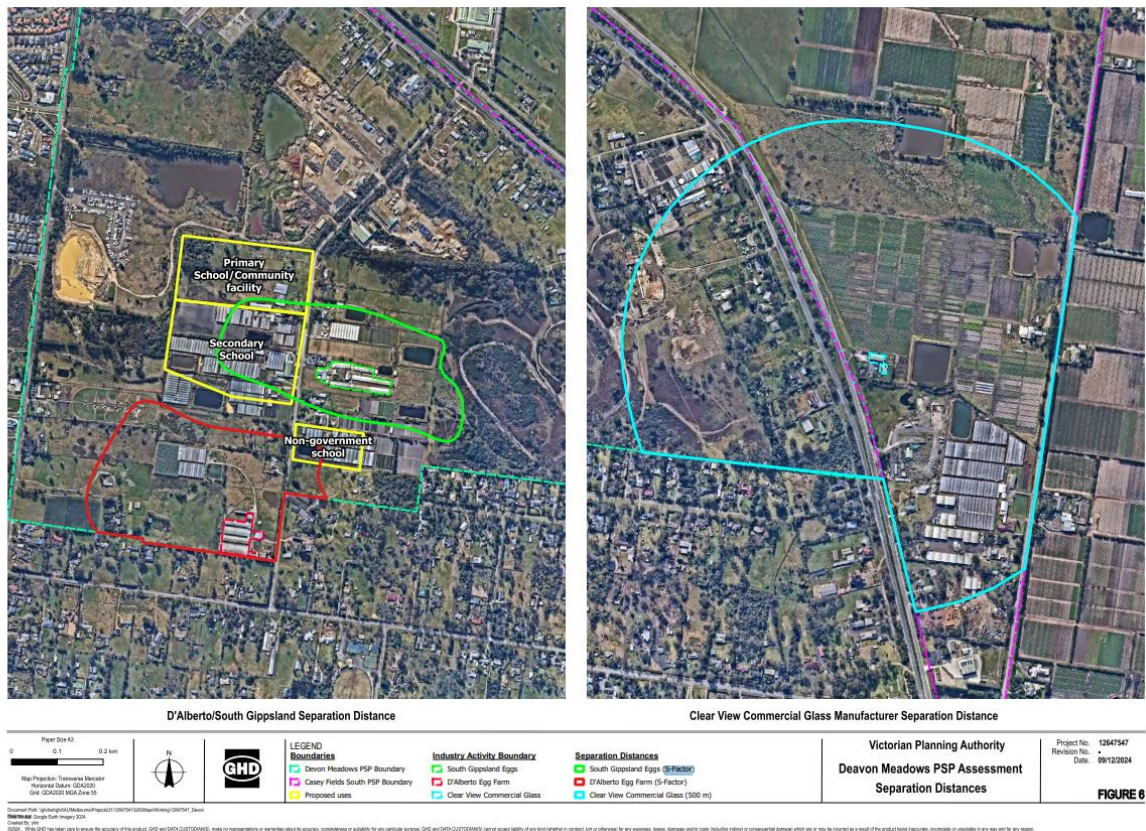


Figure 7 –South Gippsland Eggs S-Factor Separation Distance in lime green on left panel

90. Section 8 of the odour, dust and noise assessment concludes that:

Separation distances calculated through the S-factor method should be adopted for both D'Alberto Egg Farm and South Gippsland Eggs to prevent odour or dust impacts from the two farms. As such it is not recommended for the primary school, secondary school or community facility or other sensitive uses to be developed within the S-factor separation distance while the farms continue to be in operation.

Council's emphasis

91. Section 6.7.3 of the background report adopts this conclusion, stating:

In response to the findings of the Odour, Dust, and Noise Assessment report, the PSP proposes the following:

...

It is not recommended for the primary school, secondary school or community facility or other sensitive uses to be developed within the S-factor separation distance while the farms continue to be in operation

...

92. Clause 2.6 of the draft Schedule 15 to the Urban Growth Zone is a specific provision that requires that, while the egg farms at 100 and 135 Devon Road, Devon Meadows continue to operate, an application to develop land for a sensitive use within the S-Factor separation distance of the egg farms be accompanied by an Odour Environmental Risk Assessment to the satisfaction of the responsible authority.

93. As an aside, the specific provision states:

While the egg farms at 100 and 135 Devon Road, Devon Meadows continue to operate, an application to develop land for a sensitive use (including accommodation, child care centre, kindergarten, primary school or public open space) located within a ‘separation buffer’ identified on Plan 1 of this Schedule and Plan 1 – Place Based Plan...

(Council's emphasis)

94. This specific provision requires amendment, noting the following:

- (a) There is no legend item ‘separation buffer’ on the place based plan, however, there is a legend item ‘egg farm separation distance’; and
- (b) The place based plan is Plan 2 of the draft PSP, not Plan 1.

95. Council requests the specific provision be amended as follows:

While the egg farms at 100 and 135 Devon Road, Devon Meadows continue to operate, an application to develop land for a sensitive use (including accommodation, child care centre, kindergarten, primary school or public open space) located within a 'egg farm separation distance' identified on Plan 1 of this Schedule and Plan 2 – Place Based Plan...

(Council's emphasis)

96. The Odour Environmental Risk Assessment will determine the potential adverse amenity impacts of the egg farms on the proposed sensitive use of the land.
97. If the responsible authority determines that there are likely to be odour levels arising from an egg farm which would have a detrimental impact on the amenity of the sensitive use, the land must not be developed for the sensitive use.
98. Council accepts that:
- (a) the egg farms enjoy existing use rights; and
 - (b) as the 'agent of change', the applicant for a sensitive use must demonstrate that the sensitive use will not be at risk of harm from the egg farms.
99. However, Council questions the appropriateness of locating key precinct infrastructure and sensitive uses such as the community facility and government schools within the S-Factor separation distances of the South Gippsland Eggs farm, which raises the prospect of delays in the delivery of this infrastructure until the egg farm ceases operation.
100. This approach does not deliver the infrastructure coordination objectives of the draft PSP.
101. To this end, Council requests the relocation of the community facility from Parcel DM-43 to the adjoining Parcel DM-42 to the north to be located outside the S-Factor separation distance of the South Gippsland Eggs farm.
102. The relocation of the community facility to Parcel DM-42 will ensure that the community facility can be delivered safely while the South Gippsland Eggs farm operates and without the need for an Odour Environmental Risk Assessment.

Key Item 5 – Devon Road

103. The draft PSP identifies that Devon Road is:

- (a) the primary road frontage to the two proposed government schools and community facility (Plan 2);
- (b) a local access street and Devon Shareway (20.0m) (Plans 2 and 4 and Appendix 6 – Standard road cross sections); and
- (c) not a bus capable road (Plan 4).

104. Clause 56.03-3 (Standard C4) of the Victorian Planning Provisions states:

School sites should:

- *Be integrated with the neighbourhood and located near activity centres.*
- *Be located on walking and cycling networks.*
- *Have a bus stop located along the school site boundary.*
- *Have student drop-off zones, bus parking and on-street parking in addition to other street functions in abutting streets.*
- *Adjoin the public open space network and community sporting and other recreation facilities.*
- *Be integrated with community facilities.*
- *Be located on land that is not affected by physical, environmental or other constraints.*

Schools should be accessible by the Principal Public Transport Network in Metropolitan Melbourne and on the regional public transport network outside Metropolitan Melbourne.

Primary schools should be located on connector streets and not on arterial roads.

New State Government school sites must meet the requirements of the Department of Education and abut at least two streets with sufficient widths to provide student drop-off zones, bus parking and on-street parking in addition to other street functions.

(Council's emphasis)

105. General Principle F14.1 of the PSP Guidelines states:

Education and community facilities (i.e. primary, secondary and specialist schools, kindergartens, community centres, health facilities and sport reserves) should:

- » *be co-located within community hubs*
- » *have good visual and physical links to a local centre*
- » *be located on connector streets, linked by walking and cycling paths*
- » *be located in proximity to high-quality public transport where possible*
- » *be located away from potential hazards.*

(Council's emphasis)

106. Requirement R15 of the draft PSP states:

Proposed government school sites must have a minimum of two road frontages (three preferred), one of which must be a bus-capable connector road. All roads fronting school sites must be wide enough to simultaneously accommodate safe and efficient:

- *pedestrian movement*
- *two-way traffic and cycling movement*
- *student drop-off zones, and indented parking of cars and buses.*

(Council's emphasis)

107. The draft PSP does not implement the above standard, general principle and requirement of the draft PSP for the primary road frontage to the two proposed government schools and community facility.

108. Compared with the Connector Street (25m) cross section, the Devon Shareway (20.0m) cross section incorporates:

- (a) reduced carriageway widths (that is, 3m compared to 3.5m in the connector street cross section);
- (b) parking bays on one verge only (that is, a 2.5m parking bay on one verge only compared with 2.1m parking bays on both verges in the connector street cross section); and
- (c) narrower nature strips and, therefore, reduced potential tree canopy outcomes.

109. Section 4.6.3 of the background report states that the Devon Shareway cross section incorporates 2.5m indented parking on both sides of the road, which conflicts with the Devon Shareway cross section.
110. The background report has not justified why Devon Road is not a bus capable road.
111. Council's Transport team frequently has to manage traffic operations around schools located on appropriately sectioned connector streets, with the management of car parking being a key issue raised by local residents for Council officers to manage.
112. Council has concerns with the proposed Devon Shareway cross section and foresees traffic operations challenges following the implementation of this cross section where buses for the government school students cannot service Devon Road and car parking is limited.
113. Council requests the amendment of the draft PSP to implement the Connector Street (25m) cross section for Devon Road, which would provide the required road infrastructure on the primary road frontage to the two proposed government schools and community facility.
114. Council accepts that the implementation of the Connector Street (25m) cross section will require land from adjoining parcels and submits that the draft PSP should direct the implementation of this cross section, with the adjoining parcels on each verge providing 2.5m being the fairest outcome for the benefit of the precinct.

Key Item 6 – Plan Layout

115. Figure 2 of the draft PSP incorporates many urban structure inefficiencies, some of which are marked up in **Figure 8** below and noted in **Supplementary Information Item 1 – Additional Submission Items**.

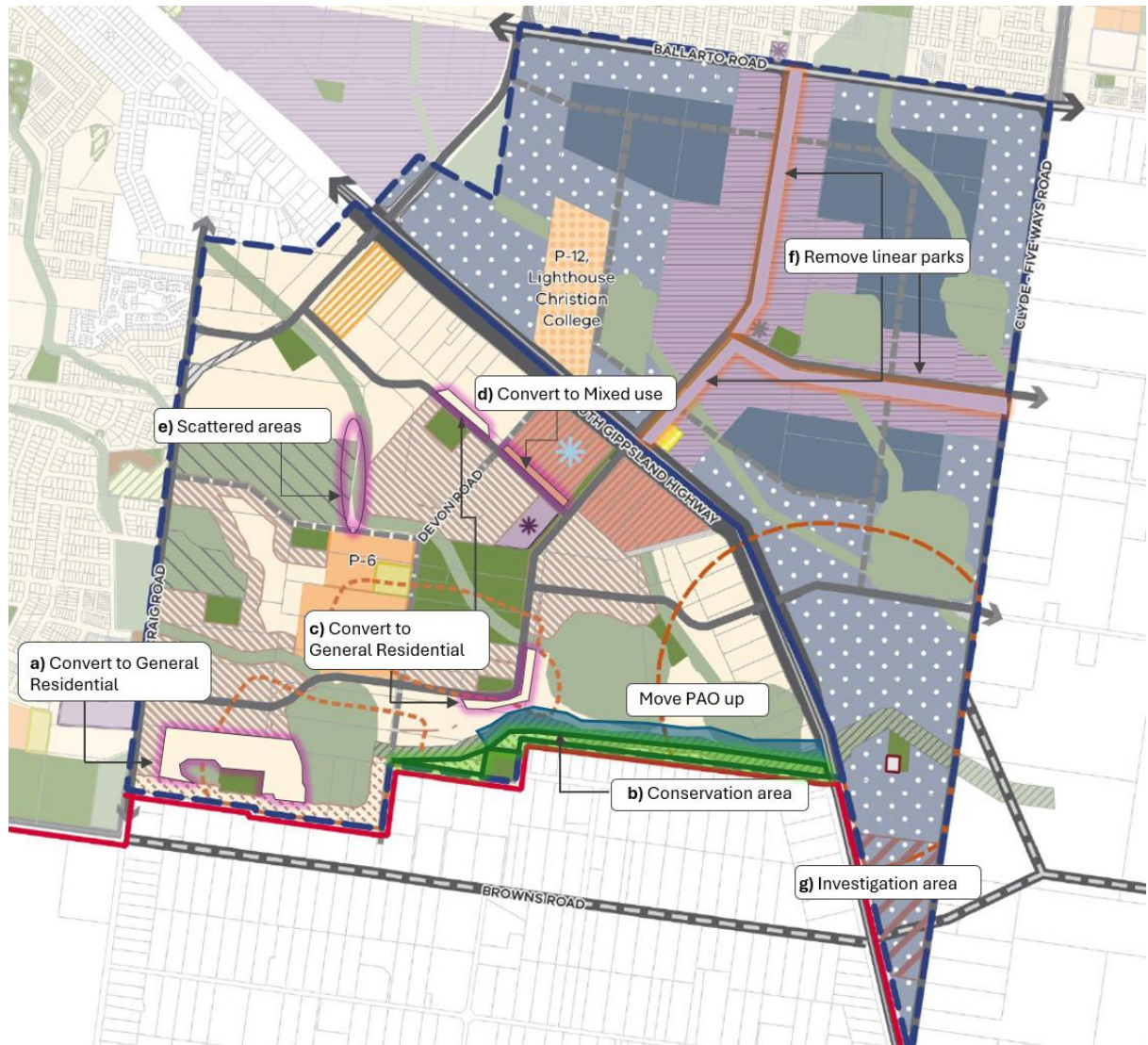


Figure 8 – Required amendments to Plan 2 – Place Based Plan

116. The letter identifiers in Figure 8 above are discussed further below:

- (a) A more transitioned urban structure outcome is required in south-west Devon Meadows via an applied General Residential Zone;
- (b) A conservation area that protects native vegetation located on the southern boundary of Devon Meadows and the Urban Growth Boundary, which is discussed further below;
- (c) There are indeterminate "areas of increased density" that do not provide a balanced urban structure outcome and must be resolved;
- (d) The expansion of the "mixed use" south-west to the connector street is logical;
- (e) There are many scattered areas of "residential" located between "other uncredited open space" (waterways and drainage) that are undevelopable. Figure 8 provides just one example here. In particular, the irregular shaped waterway and drainage network shown on Parcels DM-49, DM-56, DM-75, DM-78, DM-81 and DM-82 are likely to render significant parts of these parcels undevelopable. Council is concerned with this proposal, noting that the viable development of these parcels is critical to the provision of the enabling drainage infrastructure required to catalyse the development of the wider precinct (Plan 9);
- (f) The linear local parks on connector streets in Casey Fields South are not a practical outcome given both sides of these streets will be required for access to parcels. Refer **Key Item 3 – Open Space** for Council's position on these linear connections;
- (g) Other than Table 10, the draft PSP does not deal with the "investigation area". The VPA must make a statement on its purpose, anticipated outcomes and potential impact on future development of the impacted area.

117. Further on the "investigation area", the concluding bullet point of section 4.5.1 of the background report states:

- *To preserve the land that may be required to deliver a future connection, the proposed schedule to the Urban Growth Zone will require any proposal for subdivision, buildings or works within the investigation area to be referred to The Department of Transport and Planning (Transport for Victoria) as a determining referral authority.*

(Council's emphasis)

118. The draft Schedule 15 to the Urban Growth Zone does not include a requirement for the referral of applications within the “investigation area” to the Department of Transport and Planning, which the VPA must resolve.
119. In item (b) on Figure 8 above, Council proposes a conservation area that protects native vegetation located on the southern boundary of Devon Meadows and the Urban Growth Boundary.
120. Plan 13 – Native Vegetation Retention and Removal shows a significant amount of native vegetation on the southern boundary of Devon Meadows between Devon Road and the South Gippsland Highway.
121. The proposed conservation area would provide for:
 - (a) the retention of a significant amount of native vegetation within the precinct;
 - (b) a practical use of land rendered undevelopable by the Public Acquisition Overlay located immediately to the north; and
 - (c) a green buffer to the rural living in the Green Wedge Zone to the south.
122. Council’s proposed local park LP-05 (Figure 6) should remain and will be accessed from Devon Road.

Key Item 7 – Native Vegetation and the Melbourne Strategic Assessment

123. The precinct is located within the Melbourne Strategic Assessment (MSA) program area:

The Melbourne Strategic Assessment (MSA) Program ensures that development in these areas follows strict Victorian and Australian environmental laws, and our biodiversity is protected into the future. The program is underpinned by the MSA Act.

... Developers must follow certain requirements, including paying the MSA levy. The levy goes towards funding the creation and management of our conservation reserves and programs and running much-needed conservation management programs for vulnerable species.¹

(Council's emphasis)

124. The MSA program does not require the provision of conservation areas within the precinct, however, requires habitat connectivity corridors to support the movement of the Southern Brown Bandicoot from the Royal Botanic Gardens Cranbourne through Devon Meadows into neighbouring suburbs.
125. These habitat connectivity corridors will be provided along drainage corridors in Devon Meadows.
126. Under the *Melbourne Strategic Assessment (Environment Mitigation Levy) Act 2020 (MSA Act)*, developers must pay an environment mitigation levy to develop land, which is a financial offset for any impacts on biodiversity, including native vegetation.
127. Requirement R10 of the draft PSP requires the retention of all trees identified on Plan 13 which the plan legend identifies as “vegetation to be retained”, with some limited exceptions.

¹ <https://www.msa.vic.gov.au/about-the-msa-program/how-it-works>

128. The draft Schedule to Clause 52.17 – Native Vegetation states:

Area	Description of native vegetation <u>for which no permit is required to remove, destroy or lop</u>
Land shown as UGZ6, UGZ7, UGZ8, UGZ10, UGZ14, SUZ4 & <u>UGZ15</u> .	<p><u>All native vegetation in the levy area within the meaning of the Melbourne Strategic Assessment (Environmental Mitigation Levy) Act 2020.</u></p> <p><u>This does not apply to native vegetation, habitat or scattered trees identified as to be retained or reinstated in:</u></p> <p>...</p> <ul style="list-style-type: none"> • <u>Plan 14 in the incorporated Casey Fields South (Employment) and Devon Meadows Precinct Structure Plan</u>

(Council's emphasis)

129. The draft Schedule to Clause 52.17 appears to contradict itself, noting:

- (a) the first sentence in the second column provides an exemption from the requirement for a permit to remove, destroy or lop native vegetation in the MSA levy area, which is the case for the most recent PSPs approved by the Minister that apply in Casey, however
- (b) the second sentence states that this exemption does not apply to native vegetation identified as to be retained in Plan 14 in the draft PSP.

130. In the other words, the VPA requires a permit to remove, destroy or lop any vegetation shown to be retained on Plan 13.

131. Under Section 14(a) of the *Planning and Environment* 1987, one of the duties of Council as the responsible authority is to efficiently administer the planning scheme.

132. Council's position is that the draft PSP and associated ordinance that implement the PSP must complement, but not duplicate, the legislative provisions of the MSA Act.

133. The draft PSP and associated ordinance do not fulfil this role, adding unjustified layers of regulation of vegetation on top of the MSA Act through the requirements for:

- (a) the retention of all vegetation shown on Plan 13; and
- (b) a permit to remove, destroy or lop any vegetation shown on Plan 13.

134. The approach proposed by the VPA does not provide for the efficient administration of the planning scheme where matters are dealt with by existing legislation.

135. To this end, Council proposes the following alternative:

- (a) demote R10 to a guideline;
- (b) introduce a new guideline that reads:

Subdivision design should consider opportunities to retain arborist assessed significant trees where safe, sustainable and practicable within the public realm – including road reserves and open space – and within private lots. The practicality of retaining trees should consider Objectives 12, 13 and 20 and the need for major earthworks, excavation or cut and fill and like activities that are necessary to deliver public infrastructure and appropriately sized, located and accessible commercial, industrial and residential lots.

- (c) amend Objectives O12, O13 and O20 to reference the two new guidelines and remove the reference to R10; and
- (d) amend the draft Schedule to Clause 52.17 in accordance with **Supplementary Information Item 1 – Additional Submission Items.**

136. Council's proposed alternative is not novel.

137. The VPA presented this proposed alternative in the Final Day Version of the Croskell (Employment) PSP tabled by the VPA at the VPA Projects Standing Advisory Committee hearing for Amendment C296case on 2 April 2025, which provides a precedent here.

138. To Council's earlier submission, consistency between precinct structure plans, at least within a municipality, is desirable for efficient implementation and administration of the planning scheme.

139. The VPA must also resolve the following cross-referencing errors:

- (a) R10 states that “Trees identified as ‘To be retained’ on Plan 13 Native Vegetation Retention & Removal must be retained” however Plan 13 includes no such legend item, only ‘vegetation to be retained’ or ‘vegetation patch to be retained’; and
- (b) the draft Schedule to Clause 52.17 cross-references Plan 14 of the draft PSP (Bushfire), which must be corrected to Plan 13.

140. For further information, please refer to **Supplementary Information Item 1 – Additional Submission Items**.

Key Item 8 – Canopy Tree Coverage and Residential Densities

141. There is significant tension between the aspirations for increased canopy tree coverage within the public realm and increased residential densities in the draft PSP.

142. Performance Target T13 of the PSP Guidelines states:

Potential canopy tree coverage within the public realm and open space should be a minimum of 30% (excluding areas dedicated to biodiversity or native vegetation conservation).

143. Requirement R11 of the draft PSP implements Performance Target T13 of the PSP Guidelines:

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

144. Council supports the inclusion of Requirement R11 in the draft PSP, which delivers the following Council planning priorities and actions:
- (a) Strategic Priority 3.3 of the adopted City of Casey Draft Council Plan 2025 – 2029:
Improve city greening with a focus on tree canopy cover, and promote the protection and enhancement of biodiversity and other natural resources across Council and private land.
 - (b) Action 1.2 of the adopted Greening Casey:
Continue to support a 30% tree canopy target in the public realm and open space areas in future Precinct Structure Plans (PSP's).
 - (c) Action 44 of the adopted Climate Resilient Casey 2024 – 2030:
Advocate for a requirement for all new subdivisions to provide a minimum 30% potential canopy tree coverage within the public realm and open space in new precinct structure plans prepared by the Victorian Planning Authority, consistent with the Precinct Structure Planning Guidelines: New Communities in Victoria; October 2021.
145. The best opportunity to deliver this target for canopy tree coverage within the public realm (**target**) lies in the future streetscapes of the precinct, given the extensive areas that will be required for road reserve.
146. However, Council is concerned the VPA has not incorporated the right implementation tools in the draft PSP to deliver this target in these future streetscapes.
147. Concurrently, the draft PSP achieves the following dwelling densities:
- (a) 30 dwellings per net developable hectare (**NDHa**) in areas of increased density shown on Plan 2; and
 - (b) 24 dwellings per NDHa across the precinct.
148. These dwelling densities are significantly higher than the average target dwelling density of 21 dwellings per NDHa in the *Minta Farm Precinct Structure Plan*, the most recent residential PSP approved by the Minister that applies in Casey.
149. Front-loaded small lot dwelling product is the most popular higher density product in Casey's growth areas, noting that the market does not yet support multi-storey apartment style/strata title development suggested in the draft PSP.

150. Therefore, Council foresees significantly more of this front-loaded small lot dwelling product will be proposed to deliver the required dwelling densities in the precinct.
151. If not appropriately regulated, the increased delivery of front-loaded small lot dwelling product will require extensive crossovers that compromise potential canopy tree coverage.
152. Curiously, there is no requirement in the draft PSP to manage the impacts of front-loaded small lot dwelling product on the public realm, which contrasts with the following five (5) most recent residential PSPs approved by the Minister that apply in Casey:
- (a) Minta Farm PSP Requirement R75 approved October 2018:
Where a lot is 6 metres or less in width, vehicle access must be via rear laneway, unless otherwise approved by the responsible authority.
 - (b) Cardinia Creek South PSP Requirement R64 approved March 2018:
Where a lot is six metres or less in width, vehicle access must be via a rear laneway, unless otherwise approved by the responsible authority.
 - (c) Thompsons Road PSP Requirement R49 approved November 2014
Where a lot that is six metres or less in width, vehicle access must be via rear laneway, unless otherwise approved by the responsible authority.
 - (d) Clyde Creek PSP Requirement R54 approved October 2014:
Where a lot that is six metres or less in width, vehicle access must be via rear laneway, unless otherwise approved by the responsible authority.
 - (e) Casey Fields South Residential PSP Requirement R40 approved October 2014:
Where a lot is six metres or less in width vehicle access must be via a rear laneway, unless otherwise approved by the responsible authority.
153. Such a requirement has provided an effective built form control to manage the impacts of front-loaded small lot dwellings on the public realm in these precincts, noting that a requirement in a PSP must be adhered to in the development of land.
154. In other words, when compared to its predecessor PSPs identified above, the draft PSP:
- (a) incorporates requirements for increased residential densities, but
 - (b) removes requirements to manage the impacts of these increased residential densities on the public realm.

155. The omission of such a requirement from the draft PSP represents a backward step in the delivery of a high quality public realm and provides no confidence that the target can be achieved.
156. Without a requirement for rear loading of lots 6m wide or less, the VPA has not provided Council, who will be the responsible authority for any future PSP approved by the Minister, with the right implementation tools to achieve the target.
157. The delivery of a target is as important as the target itself.
158. Therefore, Council requests the inclusion of a new requirement at Section 3.4 – High quality public realm of the draft PSP to provide assurance of the delivery of the target:

Where a lot is 6 metres or less in width, vehicle access must be via a rear laneway, unless otherwise approved by the responsible authority.

Key Item 9 – Telecommunications Network

159. Council views cellular telecommunication networks as an essential service and seeks planning provisions that encourage the earlier delivery of cellular telecommunication services in new residential and commercial estates.
160. At its 18 February 2025 meeting, Council resolved to endorse the following notice of motion to proceed to the Municipal Association Victoria State Council in May 2025:

The MAV calls on the Victorian State Government to mandate cellular telecommunication networks as an ‘essential service’ and planning controls that require earlier delivery of cellular communication services in new residential and commercial estates.

161. Council supports Objective O31 and Requirement R20 of the draft PSP to facilitate the earlier delivery of mobile telecommunications infrastructure under the Commonwealth *Telecommunications in New Developments* policy:

Objective O31:

To ensure development is staged in an orderly manner that is consistent with the planned and delivery of necessary infrastructure.

Requirement R20:

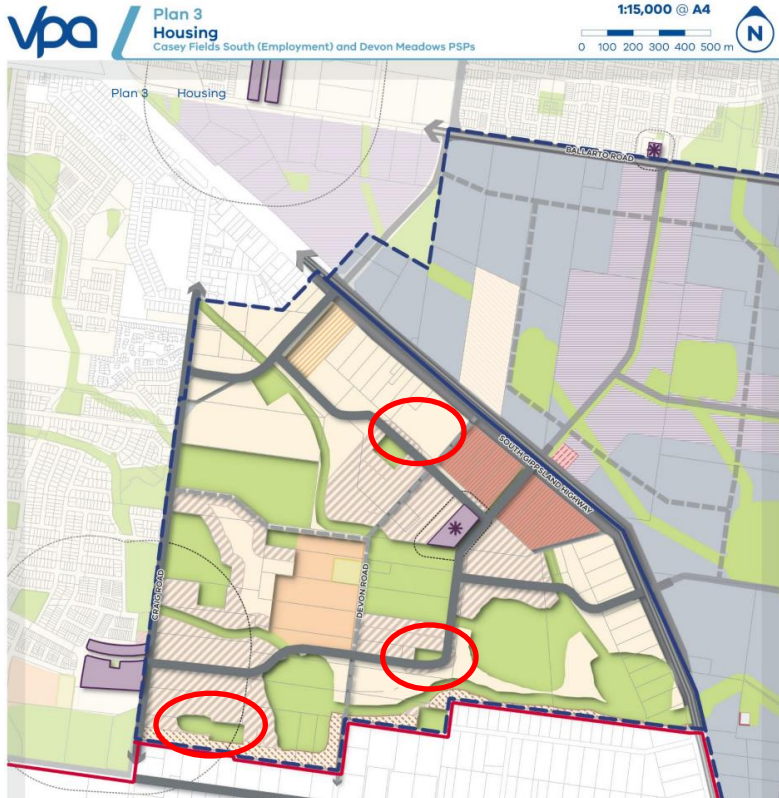
Above-ground utilities (such as electricity substations, sewer pump stations, telecommunications facility, and overhead powerlines) must be identified at the


subdivision design stage to ensure effective integration with the surrounding neighbourhood. This includes meeting requirements for mobile telecommunications infrastructure under the Commonwealth Telecommunication in New Developments (TIND) Policy. Land required to accommodate the infrastructure must not be counted as contributing to open space requirements specified in Table 6Open space delivery.

SUPPLEMENTARY INFORMATION ITEM 1 - Additional Submission Items

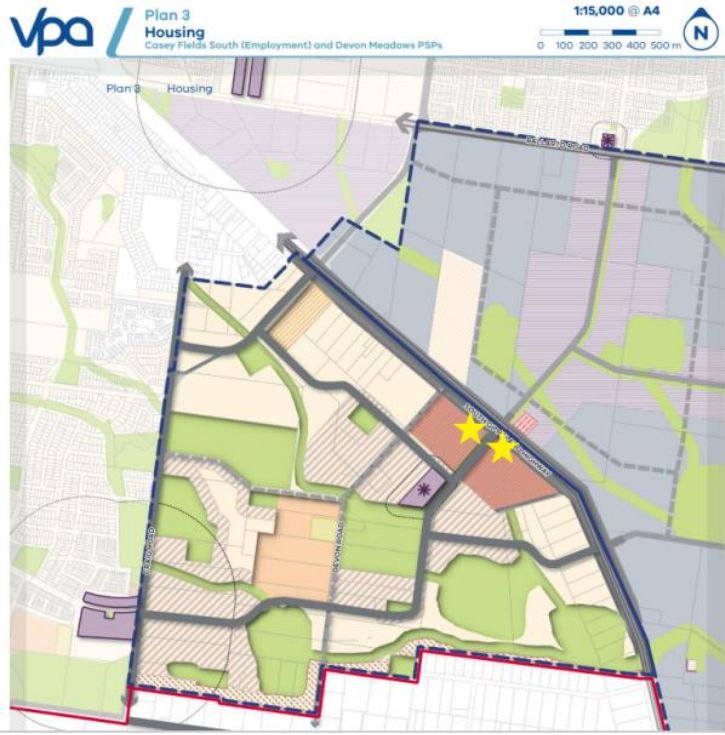
Additional Submission Items			
Public Consultation March 2025			
PSP DOCUMENT			
Item No.	PSP Theme	Reference Section	Council Submissions
1.	Contents		Correct or remove: At the top of the Contents page there are two *sections(?) that add no value to the document and are numbered page 0.
2.	2 PSP Outcomes	2.1 PSP Vision	Amend: There are inconsistencies with this section and the content within the document.
3.		2.2 PSP Purpose	Amend: The performance summaries of both Casey Fields South (Employment) (Figure 1) and Devon Meadows (Figure 2) are inconsistent with the content within the document.
4.		Every Plan	Amend: the western component of 95 Devon Road that must be retained for conservation purposes must be shown on all plans as conservation and not residential. See the marked-up image below. <div></div>
5.		Plan 2 Place Based Plan And every other affected	Amend: Each plan layer has been placed without due consideration on the impact of achieving the purpose and objectives of the PSP.

		<p>plan throughout the document.</p>	<ul style="list-style-type: none">• The layout of the Place Based Plan (and effectively every plan after that), particularly in the Devon Meadows precinct does not allow for efficient development, and as a result compromises the reality of the net developable area with which infrastructure contributions are calculated. <div data-bbox="1047 220 1762 961"><p>The map, titled 'Plan 3 Housing', shows a precinct with various land use zones in shades of green, yellow, and blue. A dashed blue line outlines a specific area. Several red circles are drawn on the map, highlighting specific locations. The map includes a scale bar (0 to 500m) and a north arrow. The title 'Plan 3 Housing' and 'Casey Fields South (Employment) and Devon Meadows PSPs' are visible at the top left.</p></div> <ul style="list-style-type: none">• There are gaps of 'residential' land between the mixed-use area and drainage assets and roads that will not be able to be developed.• Align drainage assets with parcel boundaries/roads in a uniform manner.
6.			<ul style="list-style-type: none">• The layout of the Place Based Plan (and effectively every plan after that) has ill-fitting residential outcomes which makes development applications difficult to affect.

			 <ul style="list-style-type: none"> • Area of increased density is not desirable in the circled areas. • The western mixed-use area should be road bound.
7.			<ul style="list-style-type: none"> • The extent and locations of the shading of decreased density (Transitional Density in Table 1) gives a false impression of developmental ability. Do not show this shading in the land between drainage assets and the Precinct boundary east of Devon Road.
8.			<ul style="list-style-type: none"> • Drainage assets are ineffectively placed within the urban framework.
9.		Plan 2 Place Based Plan And every other affected plan throughout the document.	Amend: The residential area between the proposed Melbourne Water diversion pipe and the urban growth boundary from Devon Road to South Gippsland Highway is considered undevelopable due to available land area, plus the significant amount of high-quality trees in that area, makes for a strong argument to amend the proposed land use and subsequent applied zoning to conservation. It is strongly recommended that clear and defined dimensions for the conservation area are noted within the PSP document.
10.		Plan 2	Remove: The symbol and corresponding legend for the indicative health facility, it is not strategically justified.
11.		Plan 2	Add: Two symbols at the entry from Gippsland Highway into the mixed-use & commercial centre area. Add corresponding legend for 'Urban Gateway Character'
12.		Plan 2	Legend amendment: the 'residential' wording in the legend should be consistent with both Plan 3 and Table 1. 'Residential' should read – <i>Balance area</i>

			<p>'Area of increased density' should read – <i>High-density area</i></p> <p>'Area of decreased density' should read – <i>Transitional density area</i></p>
13.		Plan 2	<p>Comment: Curvaceous alignment of green space results in inappropriate and impractical areas of developable land, resulting in difficulties for land developers and the responsible authority to deliver appropriate urban structures. Where possible, align minor inconsistencies to relevant property boundaries to simplify this issue and reduce issues in implementing.</p> <p>Align green spaces with relevant property boundaries to simplify implementing high quality development.</p>
14.		Plan 2 Place Based Plan & Plan 4 Movement and Network Plan	<p>Explain: There is a marked area on both plan 2 and Plan 4 that identifies an “investigation area”, but no further explanation within the PSP document as to what is being investigated.</p> <p>An explanation or removal of the marked area is recommended.</p> 
15.		3.1.1 Objectives	<p>Add a new Objective 02: <i>Provide a high-quality built-form design that creates a sense of place and uses materials that are responsive to the environmental characteristics of the area.</i> Implementation Tool: Table 1</p>
16.		3.1.2 Requirements and Guidelines	<p>Amend: <i>Residential subdivision and development must be generally in accordance with the density, distribution and diversity targets set in Plan 3 Housing and Table 1 Housing density & diversity to the satisfaction of the responsible authority. Residential subdivision and development that can demonstrate how target densities can be achieved over time may be considered.</i></p>
17.		3.1.2 – G1	<p>Remove: the words “amenity areas” the term is no longer in use within this document.</p>
18.		3.1.2 – G2	<p>Request rewording: <i>Residential subdivision and development that contributes to meeting the 10% affordable housing target is encouraged. To encourage that, Council will be open to negotiating optimal outcomes if an application is accompanied with a partnership with a registered community housing provider.</i></p>
19.		3.1.2 – G3	<p>Request rewording: <i>Affordable housing products should be located in high amenity areas close to services and community facilities and provide for a range of housing typologies to meet demonstrated local needs generally in accordance with Table 1</i></p>

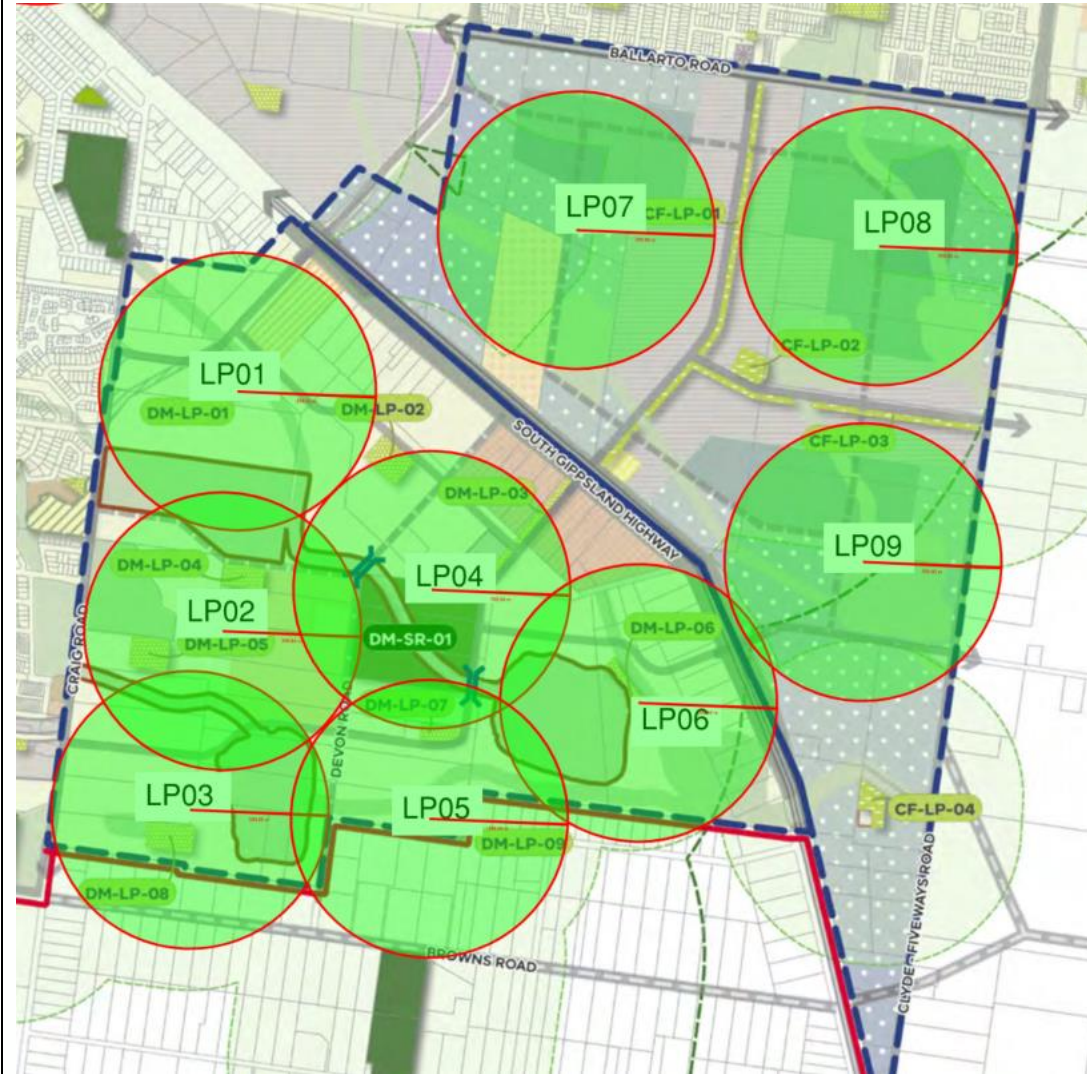
			<i>Housing density & diversity.</i>
20.		3.1.2 – G6	<p>Re-word text: <i>Development in the mixed-use area adjacent to the South Gippsland Highway marked as urban gateway character on Plan 3 should:</i></p> <ul style="list-style-type: none"> • <i>Support the sense of arriving at a destination</i> • <i>Make a positive contribution to creating a distinct ‘gateway character’ between urban Melbourne and the Gippsland Region.</i> • <i>Landmark architecture should incorporate exemplary and high-quality built form design and active frontage to both Gippsland Highway and north-south connector street.</i> • <i>Development should deliver a taller building mass, with a minimum two storey.</i> • <i>Include public areas integrated with high-quality landscaping and meaningful public art elements that could have relevance to history or site context</i>
21.		3.1.2 – Table 1	Add: under the sub-heading <i>Table 1 Housing density and diversity</i> and before the actual table, include the wording - Residential development must be in accordance with the adopted policy <i>Housing Strategy, 2019</i> or any adopted version thereafter.
22.		3.1.2 – Table 1	<p>Request additional wording: to each section of this table that reads:</p> <p><i>Development should provide active frontages into the precinct and avoid 'back of lot' interfaces to publicly accessible areas.</i></p>
23.		3.1.2 – Table 1	<p>Amend: The “Mixed Use Area” housing catchment area needs to be adjusted to better reflect the purpose of the area.</p> <p><i>The purpose of the Mixed Use area is to enable a node of higher intensity of development and concentration of activity that will demarcate this part of the South Gippsland Highway as having a distinct sense of place, and support an emerging identity as an ‘urban gateway’ for travellers moving between Melbourne and the Gippsland Region, and between the precincts.</i></p> <p><i>enable higher density development to be delivered in conjunction with local businesses and amenities to support a compact ‘walkable’ style of urban environment.</i></p>
24.		3.1.2 – Table 1	Amend: The wording “Activity Centre” is incorrect. The only activity centre shown on Plan 3 is the Botanic Ridge activity centre. The Precinct contains a “Local convenience centre”. Amend the table to reflect the correct phrasing.
25.		3.1.2 – Table 1	Amend: “Transitional Density” - dot point two under <i>Target typologies</i> Development should must provide active frontages into the precinct and avoid 'back of lot' interfaces to publicly accessible areas.
26.		Plan 3 Housing	Amend: Add node markers where the yellow star are to identify the preferred location for urban gateway character – picked up in G6.

			
27.			<p>Amend: The residential area within the red circle below is recommended to be higher density to help offset reduced densities at the southern interface. The proximity to Botanic Ridge activity centre and the two schools deems this a viable outcome.</p>
28.	3.2 Safe, Accessible and Well-Connected	3.2.2 Requirements and Guidelines	<p>Add R5 and R6 to objective O4, To effectively connect key destinations, and to integrate the transport network with existing and planned land uses and movement networks.</p>
29.		3.2.2 New R5	<p>New R5 – Subdivision design must provide for a coordinated and permeable transport network that branches across abutting parcels.</p> <p>Given the level of fragmentation and lack of direction on the sequencing of parcels (which there shouldn't be), applications must demonstrate how a permeable movement network will be achieved by demonstrating connections to adjoining parcels.</p>
30.		3.2.2 New R6	<p>New R6: For higher residential densities, the number of vehicle crossovers into the allotment should be minimized and promote vehicle access from rear laneways, to allow for more tree planting and a higher streetscape amenity. Vehicle access to allotments must be avoided along high pedestrian activity areas and streetscapes, particularly immediately adjacent the Local Town Centre area.</p>
31.		Plan 4 Movement Network	<p>Request line colour change: the UGB line looks very similar to other road colours across the PSP. Please change the UGB line colour to black.</p>

32.		Plan 4	Remove shading: The public transport catchment area shading should be removed. The whole Precinct is in a public transport catchment and extra shading is unnecessary.
33.	3.3 Connect People to Jobs and Higher Order Services	3.3.2 – G13	Amend wording: <i>Subdivision and development involving the delivery of employment land should be in accordance with consider the City of Casey Employment Land Design Guide 2022 and, where relevant, the City of Casey Restricted Retail Design Guide 2023 (or subsequent revisions) – to be consistent with Croskell.</i>
34.	3.4 High quality public realm	3.4.2 Requirements and Guidelines	Remove R6: it is a guideline at best and unhelpful to development assessment.
35.		3.4.2 – R10 to G21	<p>Amend wording and change status: Addressed under <i>Key Item 7 – Native Vegetation and Melbourne Strategic Assessment.</i></p> <p>This cannot be a Requirement, we recommend it be made a Guideline.</p> <p><i>Trees and native vegetation identified as ‘To be retained’ on Plan 13 Native Vegetation Retention & Removal must should be retained, and provision made for their ongoing maintenance, unless it can be demonstrated that:</i></p> <p><i>a) Any potential adverse effects on local character or amenity as a result of removing the tree(s) can be adequately mitigated (e.g. through replacement planting)</i></p> <p><i>b) Any potential adverse effects on Aboriginal cultural heritage values are avoided or appropriately mitigated</i></p> <p><i>c) Any potential adverse effects on ecological values (including soil conservation and water quality) as a result of removing the tree can be adequately mitigated</i></p> <p><i>d) Retaining the tree(s) would unreasonably limit the ability to provide a building platform, access, and/or associated civil services</i></p> <p><i>e) Removal of the tree(s) is necessary to provide for the functional and operational needs of infrastructure, including, drainage, community infrastructure, and the road network</i></p> <p><i>f) Retaining the tree would result in an unacceptable level hazard or safety risk.</i></p>
36.		3.4.2 – G12 & G13	Swap these two guidelines so that G13 becomes G12 and G12 becomes G13. The <i>City of Casey Employment Land Design Guide 2022</i> and the <i>City of Casey Restricted Retail Design Guide 2023</i> are most helpful and directive in subdivision and development planning.
37.		3.4.2 – New G22	New Guideline: <i>Subdivision design should consider opportunities to retain arborist assessed significant trees were safe, sustainable and practicable within the public realm – including road reserves and open space – and within private lots. The practicality of retaining trees in this manner should consider Objectives 12, 13 and 20 and the need for major earthworks, excavation or cut and fill.</i>

38.		3.4.2 – G24	<p>Amend wording: Integrated water planning should be consistent across the newer PSP’s. The below is copied from Guideline 16 of the Croskell (Employment) PSP and we request that.</p> <p><i>Applications should consider a range of IWM options as indicated in Error! Reference source not found.. Potential IWM options may include but are not limited to:</i></p> <ul style="list-style-type: none"><i>a) Recycled water to residential and / or non-residential areas</i><i>b) Stormwater or regional rainwater harvesting for open space irrigation</i><i>c) Rainwater harvesting for commercial/industrial zones</i><i>d) Passive irrigation of street trees from road runoff</i><i>e) Roof irrigation to evaporate stormwater in industrial areas</i><i>f) Dedicated spongy areas in the waterway corridor</i><i>g) Green roofs for commercial buildings.</i>																																				
39.		3.4.2 – G26	Review for grammar, formatting and spelling.																																				
40.		3.4.2 – G26	Add: 'to the satisfaction of the responsible authority'																																				
41.		3.4.2 – G26	Add: g) in accordance with City of Casey Open Space Strategy, 2023 or any adopted version thereafter.																																				
42.		3.4.2 – G28	Move: this Guideline should be a Requirement. Adjust wording to Requirement standards *must.																																				
43.		Table 6 – Open space delivery	<p>New Table 6:</p> <table><tr><th>Identifier</th><th>Type</th><th>Size</th><th>Attributes</th></tr><tr><td>DM-LP-01</td><td>Passive Open Space (Local Park)</td><td>1.50ha</td><td>Northern west</td></tr><tr><td>DM-LP-02</td><td>Passive Open Space (Local Park)</td><td>1.50ha</td><td>Central west</td></tr><tr><td>DM-LP-03</td><td>Passive Open Space (Local Park)</td><td>1.00ha</td><td>Abutting drainage</td></tr><tr><td>DM-LP-04</td><td>Passive Open Space (District Park)</td><td>2.00ha</td><td>Adjacent to public schools</td></tr><tr><td>DM-LP-05</td><td>Passive Open Space (Local Park)</td><td>0.80ha</td><td>Adjacent to the water flow</td></tr><tr><td>DM-LP-06</td><td>Passive Open Space (Local Park)</td><td>1.00ha</td><td>Abutting drainage</td></tr><tr><td>CF-LP-07</td><td>Passive Open Space (Local Park)</td><td>0.80ha</td><td>Located central west to the industrial precinct</td></tr><tr><td>CF-LP-08</td><td>Passive Open Space (Local Park)</td><td>0.60ha</td><td>Located central east the industrial precinct (abutting drainage)</td></tr></table>	Identifier	Type	Size	Attributes	DM-LP-01	Passive Open Space (Local Park)	1.50ha	Northern west	DM-LP-02	Passive Open Space (Local Park)	1.50ha	Central west	DM-LP-03	Passive Open Space (Local Park)	1.00ha	Abutting drainage	DM-LP-04	Passive Open Space (District Park)	2.00ha	Adjacent to public schools	DM-LP-05	Passive Open Space (Local Park)	0.80ha	Adjacent to the water flow	DM-LP-06	Passive Open Space (Local Park)	1.00ha	Abutting drainage	CF-LP-07	Passive Open Space (Local Park)	0.80ha	Located central west to the industrial precinct	CF-LP-08	Passive Open Space (Local Park)	0.60ha	Located central east the industrial precinct (abutting drainage)
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CF-LP-09	Passive Open Space (Local Park)	0.60ha	Located southeast in the industrial precinct (abutting drainage)
Total		9.80ha	



44.		Plan 5	<p>Amend: There are currently three linear parks CF-LP-03, LP-LP-03 and DM-LP-03 which will not work logistically and need to be reconsidered. Council proposes the removal of these altogether and the inclusion of a more standardised park as noted in line 49 above.</p> <p>See <i>Key Item 3 - Open Space</i> in the written submission.</p>
45.		Plan 5	<p>Amend: The Southern Brown Bandicoot connectivity corridors on the plan needs to accurately reflect the recommendations of the</p>

			2025 updated version of the <i>Casey Fields South & Devon Meadows Biodiversity Assessment Report</i> . Specifically, Section 5 Recommendations and recommendation plans.
46.	3.5 Services and Destinations	Plan 7 And every other affected plan throughout the document.	Community facilities – update all plans for new location of community facility as requested under paragraph 67. A relocation of the facility from Property DM-43 to DM-42.
47.	3.7 Infrastructure Coordination	R27	<p>Amend: For consistency, recommend amending this requirement to be similar to the proposed Croskell PSP requirement (as per Final Day Part C (Closing) Version. We also recommend formatting it to be the same, again, for consistency.</p> <p><i>Prior to the issue of a statement of compliance for any stage of the subdivision of a PSP parcel or the commencement of development of a PSP parcel, DSS assets WD1, WD2, WD3, SGC, WD4, O1, O2, O3 identified within the respective stage shown on:</i></p> <ul style="list-style-type: none"> • <i>Plan 9 Infrastructure and Development Staging;</i> • <i>Table 8 Water infrastructure</i> <p><i>must be delivered. Where it can be demonstrated that this is not reasonably practicable, with the written consent of the responsible authority and Melbourne Water, a development may rely on:</i></p> <ul style="list-style-type: none"> • <i>The staged delivery of the assets identified for that PSP parcel; or</i> • <i>A proposal for interim drainage solutions for one or more stages; or</i> • <i>The delivery of the assets identified for that PSP parcel at a later stage of the subdivision or development.</i>
48.		R27	<p>Amend: Again, for consistency, recommend amending this requirement to be similar to the proposed Croskell PSP requirement (as per Final Day Part C (Closing) Version. We also recommend formatting it to be the same, again, for consistency.</p> <p><i>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.</i></p> <p><i>Where it can be demonstrated that this is not possible, development proposals must demonstrate:</i></p> <ul style="list-style-type: none"> • <i>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), to the satisfaction of Melbourne Water and the responsible authority.</i> • <i>No risk to the ultimate delivery of drainage assets.</i> • <i>No additional costs to the DSS arising from providing the interim or staged drainage solution.</i>

			<ul style="list-style-type: none"> <i>The ultimate asset will be delivered prior to the issue of a statement of compliance for the final stage or the completion of development of the PSP parcel.</i> <p><i>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. Development construction and interim solutions must avoid or mitigate the risk of soil erosion and waterway degradation.</i></p>
Appendix 1 PRECINCT INFRASTRUCTURE			
49.		Table 9 – Precinct infrastructure	Amend: Refer to correspondence email 28/01/2025 – Community Infrastructure DM-CI-01. Change Title to: Level 1 Community Centre. Change Description to: Purchase of land and construction of a Level 1 community centre.
Appendix 2 SUMMARY LAND USE BUDGET & PROPERTY-SPECIFIC LAND USE BUDGET			
1.		Table 10 – Summary land use budget	Amend: ICP community facility area (HA) to – 0.60
2.		Table 12 - Devon Meadows Property - Property-specific land use budget	<p>Remove: ICP community facilities, Parcel ID – DM-43, 0.60(ha)</p> <p>Amend: ICP community facilities, Parcel ID – DM-42, 0.60(ha)</p>
Appendix 4 NATIVE VEGETATION RETENTION AND REMOVAL			
3.		Plan 13 – Native vegetation Retention and Removal	<p>Amend: Please also see <i>Key Item 7 – Native Vegetation and Melbourne Strategic Assessment</i>. This Plan is in contradiction to the <i>Melbourne Strategic Assessment (Environment Mitigation Levy) Act 2020</i> and corresponding MSA Levy Area.</p> <p>The legend must be amended to be consistent with Croskell (Employment) PSP and note: MSA Timestamped vegetation, arborist assessed significant trees.</p> <p>The new Guidelines 21 and 22 (lines 37 and 39 of this document) will appropriately manage their retention or otherwise.</p>
Appendix 7 GLOSSARY OF TERMS			
4.		Term – Amenity Area	Include a new term – Amenity Area with the definition: <i>Applies a higher level of residential density to locations within 400m of activity centres, open space and the Principal Public Transport Network.</i>
ORDINANCE			

5.	Cl. 37.07S15	Sub-clause 2.2 – Table 1 Applied zone provisions	The applied zones are inconsistent with the changes we’ve noted for Plan 2, and the existing Plan 3 and Table 1.
6.	Schedule to Cl. 52.17	Sub-clause 1.0 Scheduled area	<p>UGZ15 is in a Melbourne Strategic Assessment timestamped area.</p> <p>Remove: Land shown as UGZ6, UGZ7, UGZ8, UGZ10, UGZ14, SUZ4 & UGZ15.</p> <p>Add: Land shown as UGZ9 <i>and UGZ15</i> on the planning scheme maps</p>
7.	Schedule to Cl. 72.04	Sub-clause 1.0 Incorporated documents	The Casey Fields South (Employment) and Devon Meadows Infrastructure Contributions Plan is missing from this list and should be included here as assurance it will not be forgotten at gazettal.