

Victorian Planning Authority  
 Level 25, 35 Collins Street  
 Melbourne VIC 3000

Our Ref: 24472P

26<sup>th</sup> March 2025

By email: [cfsdm@vpa.vic.gov.au](mailto:cfsdm@vpa.vic.gov.au)  
[Peter.Cooper@vpa.vic.gov.au](mailto:Peter.Cooper@vpa.vic.gov.au)  
[Mat.Garner@vpa.vic.gov.au](mailto:Mat.Garner@vpa.vic.gov.au)

Dear Sir/Madam;

**LANDOWNER SUBMISSION: CASEY FIELDS SOUTH (EMPLOYMENT) & DEVON MEADOWS PSP  
 235 CLYDE-FIVE WAYS ROAD, CLYDE 3978 (PARCEL CF-23)  
 1665 SOUTH GIPPSLAND HIGHWAY, CRANBOURNE EAST 3977 (PARCEL CF-13)  
 TITLE DETAILS: LOT 1 ON PS421555E & CP165660**

We refer to the above matter and write on behalf of the landowner, Dalmont Bay Pty Ltd and Frontlink Pty Ltd (collectively referred to as the “Mondous Property Group” or MPG) to make a submission regarding the draft Amendment C295case and the Casey Fields South (Employment) and Devon Meadows PSP currently being exhibited.

As noted above we represent MPG in relation to two land holdings which are outlined below.

<b>PSP Parcel ID:</b>	CF-23
<b>Land Address:</b>	235 CLYDE-FIVE WAYS ROAD, CLYDE 3978
<b>Registered Proprietor:</b>	[REDACTED]
<b>SPI:</b>	LOT 1 ON PS421555E
<b>Site Area:</b>	15.33 ha
<b>Proposed Land Use designation:</b>	Parcel CF-23 Area – 15.33ha Non-Arterial Road – Widening (ICP land) – 0.04ha Waterway and Drainage Reserve – 7.80ha Local Park (ICP land) – 0.03ha NDA Employment – 7.45ha (48.6%)

<b>PSP Parcel ID:</b>	CF-13
<b>Land Address:</b>	1665 SOUTH GIPPSLAND HIGHWAY, CRANBOURNE EAST 3977
<b>Registered Proprietor:</b>	[REDACTED]
<b>SPI:</b>	CP165660
<b>Site Area:</b>	1.62 ha
<b>Proposed Land Use designation:</b>	Parcel CF-13 Area – 1.62ha Non-Arterial Road – PAO – 0.30ha NDA Employment – 1.32ha (81.5%)

Please refer to the enclosed tables for details of the submission on behalf of MPG:

- TABLE 1: Initial Planning Review - PSP
- TABLE 2: Initial Planning Review – Schedule 15 to Clause 37.07 Urban Growth Zone



As discussed in our recent meeting held at 2pm on 24/03/2025, MPG were not invited to any previous discussions with the VPA since the commencement of this PSP in 2021, which has resulted in a significant loss of developable area on Parcel CF-23 as MPG were not party to these early discussions regarding the land use budget. Moving forward, it is requested that MPG and Reeds Consulting Pty Ltd be invited to attend all future consultations/meetings regarding the PSP in relation to MPG's land holdings to ensure that fair and equitable outcomes are achieved.

Given time constraints, this is a high-level planning submission, and the concerns raised are not exhaustive and only represent the preliminary views of MPG. A separate submission will be made regarding drainage matters.

Upon further assessment of the PSP and the supporting reports/background studies that informed the PSP, it is envisaged that additional feedback will be provided regarding MPG's land holdings. Expert witnesses will be engaged to represent MPG at the Standing Advisory Committee and it is anticipated that other issues with the PSP and supporting documents, will be identified.

If you have any queries regarding this submission, please contact the undersigned on the details below.

Yours faithfully,  
for REEDS CONSULTING PTY LTD

[REDACTED]  
Planning Manager

*Email:* [REDACTED]  
*Phone:* [REDACTED]  
*Mobile:* [REDACTED]

Victorian Planning Authority  
Level 25, 35 Collins Street  
Melbourne VIC 3000

Our Ref: 24472E

1<sup>st</sup> April 2025

By email: [cfsdm@vpa.vic.gov.au](mailto:cfsdm@vpa.vic.gov.au)  
[Peter.Cooper@vpa.vic.gov.au](mailto:Peter.Cooper@vpa.vic.gov.au)  
[Mat.Garner@vpa.vic.gov.au](mailto:Mat.Garner@vpa.vic.gov.au)

Dear Sir/Madam,

**LANDOWNER DRAINAGE SUBMISSION: CASEY FIELDS SOUTH (EMPLOYMENT) & DEVON MEADOWS PSP  
235 CLYDE-FIVE WAYS ROAD, CLYDE 3978 (PARCEL CF-23)  
1665 SOUTH GIPPSLAND HIGHWAY, CRANBOURNE EAST 3977 (PARCEL CF-13)  
TITLE DETAILS: LOT 1 ON PS421555E & CP165660**

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We refer to the above matter and the enclosed Landowner Submission made by our planning department on 26<sup>th</sup> March 2025. We write on behalf of the landowner, Dalmont Bay Pty Ltd and Frontlink Pty Ltd (collectively referred to as the “Mondous Property Group” or MPG) to make a drainage submission regarding the draft Amendment C295case and the Casey Fields South (Employment) and Devon Meadows PSP currently being exhibited.

We represent MPG in relation to two land holdings which are outlined in the enclosed landowner submission letter. The drainage matters raised in this submission pertain to our client’s property at 235 Clyde-Five Ways Road, Clyde 3978, a 15.33ha site designated as PSP Parcel ID CF-23 in the Casey Fields South (Employment) PSP.

As discussed in our recent meeting held at 2pm on 24/03/2025, MPG was not invited to any previous discussions with the VPA and Melbourne Water since the commencement of this PSP in 2021. This exclusion has resulted in a significant loss of developable area on Parcel CF-23, as MPG was not part of the early discussions regarding the land use budget. Moving forward, it is requested that MPG and Reeds Consulting Pty Ltd be invited to attend all future consultations and meetings regarding the PSP and Melbourne Water Drainage Scheme in relation to MPG’s land holdings to ensure fair and equitable outcomes for our client.

Given time constraints, this is a high-level drainage submission. The concerns raised are not exhaustive and only represent the preliminary views of MPG. This letter should be considered alongside the enclosed submission by our planning team dated 26<sup>th</sup> March 2025.

**Drainage related matters:**

**1) Comments on the draft PSP:**

- a) The draft PSP Plan 6 shows multiple retarding basins that are not cost-effective and hinder efficient development of this precinct. MPG requests that VPA and Melbourne Water review and optimise the draft Drainage Scheme and PSP to:
  - i) Rationalise the overall number of retarding basins.
  - ii) Provide TUFLOW flood mapping of existing conditions to ensure the landowners are informed with improved flood intelligence compared to the outdated flood overlays. This will ensure that the retarding basins are appropriately placed in flood-prone, low-lying areas of the catchment.
  - iii) Review the locations, orientations and footprint requirements of CFS2/CF-RB-02, CFS3/CF-RB-04 and CFS4/CF-RB-05 to ensure they are effective and optimised.

**2) Comments on the GHD Preliminary Concept Drainage Strategy report dated 21<sup>st</sup> February 2025:**

- a) The Concept Drainage Strategy Plan (Appendix C) does not show the existing and ultimate external flows and major assets from adjacent drainage schemes, making it difficult to understand the ultimate drainage system as a whole and whether appropriate external flows have been accounted for.
  - i) Examples include Junction Village South DSS 2363-RBWL and Casey Fields South DSS 2364-RB1A which discharge directly into Casey Fields South PSP, and are not shown in the GHD report
  - ii) Figures 1 and 2, as well as the Concept Drainage Strategy Plan in Appendix C, need to be updated to clearly show existing and proposed major drainage scheme assets upstream and downstream of the PSPs
  - iii) GHD report should adopt asset naming consistent with the PSP Plan 6 for clarity
  - iv) GHD report needs to outline ultimate retarding basin 1% AEP detention volume requirements, details of which seem to have been omitted from the report.
- b) Section 5.2 of the GHD report states that the TUFLOW hydraulic model was developed to inform the preliminary concept drainage strategy, however the report lacks existing or ultimate flood plans.
  - i) The results of the TUFLOW modelling by GHD should be shared with the landowners to ensure transparency in the development of the drainage scheme and PSPs.

**3) Comments on CFS3/CF-RB-04:**

- a) MPG requests a detailed review of CFS3/CF-RB-04 by VPA and Melbourne Water to ensure this asset is optimised to suit the existing topography and future arterial road grading requirements. MPG is concerned that the extent of CFS3/CF-RB-04 drainage reserve shown in the draft PSP Plan 6 is significantly larger than shown in the GHD Preliminary Concept Drainage Strategy Plan (Appendix C) as shown in Figure 1 below:
  - i) There is a significant difference in CFS3/CF-RB-04 wetland area extent shown on PSP plan 6 (approx. 13,500m<sup>2</sup>) compared to the GHD report (9000m<sup>2</sup>).
  - ii) Additionally, the drainage reserve area shown in PSP Plan 6 appears to be significantly larger than shown in the GHD Concept design report (Appendix C). VPA needs to explain this discrepancy.



**Figure 1:** GHD Preliminary Concept Drainage Strategy Plan (left) vs PSP Plan 6 layout (right) of CFS3/CF-RB-04

- b) MPG raise concerns regarding parameters used in the GHD report regarding CFS3/CF-RB-04 and request a thorough review of this asset by GHD, Melbourne Water and VPA:
  - i) MPG is particularly concerned that the GHD report, Table D4, indicates that the retarding basin is only 450mm deep, which exacerbates the retarding basin footprint requirement.
  - ii) MPG requests a retarding basin concept plan of this asset showing existing surface contours and typical cross sections to clarify the depth of the retarding basin and the assumptions made on the outlet. Consideration should be given to increasing the depth of the retarding basin to optimise and reduce the detention footprint.

- c) MPG would like the opportunity to work proactively with VPA and Melbourne Water to optimise the size and layout of CFS3/CF-RB-04. We suggest investigating opportunities to increase the detention depth, reduce detention footprint and delineate a more rectangular shape fronting Clyde-Five Ways Road to ensure an efficient development interface. It is our view that the preliminary concept layout of this asset has ample scope to optimise the shape and reduce land take requirements.

#### 4) Comments on CFS2/CF-RB-02 and CFS4/CF-RB-05:

- a) MPG has concerns regarding the GHD concept design and flow management of these assets:
- i) CFS2/CF-RB-02 appears superfluous and should be integrated with CFS4/CF-RB-05 into a single regional drainage scheme asset for cost-efficiency.
  - ii) The GHD report does not clearly define the extent of the catchment for CFS2/CF-RB-02. The current concept design shows a sediment pond in the northern portion of the drainage reserve, while local flows from the west also discharge into the southwest corner of the reserve. The current drainage reserve grades north to south, and the GHD concept design is not sensitive to existing topography and will require significant excavation to allow treatment of the local catchment to the west.
  - iii) We have concerns about whether CFS4/CF-RB-05 can be designed to function as an offline wetland. It is unclear whether any consideration has been made on how to discharge local catchment from either side of the high-flow bypass channel into the sediment pond and wetlands. A concept design plan should be provided for each of these assets to show the high-flow bypass arrangement and its interaction with local low flows that need to be discharged into the wetland.

#### 5) Comments on Galileo's proposal:

- a) MPG is supportive of Galileo's proposal shown in Figure 2 below, which shows the full removal of SFC2/CF-RB-02 from the subject land. MPV's view is that Galileo's proposal, in the form shown in Figure 2, rationalises the drainage assets and increases the development potential of the overall precinct. Additionally, Galileo's proposal addresses some of the MPG concerns outlined in item 4 above regarding retarding basins CFS2/CF-RB-02 and CSF4/CF-RB-05.

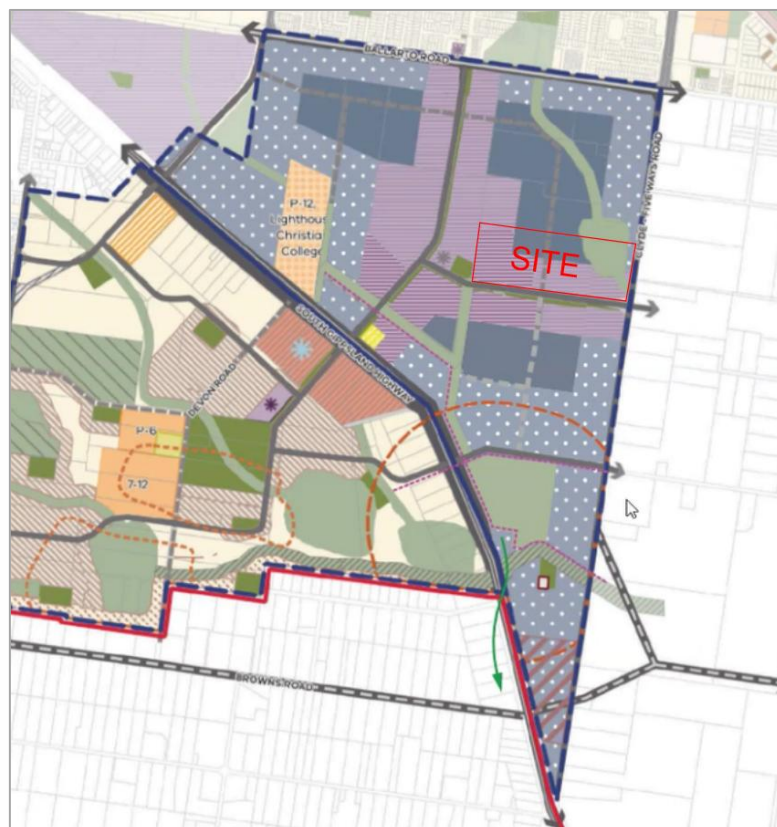


Figure 2: Galileo proposal to rationalise Retarding Basins CF-RB-02 and CF-RB-05

**6) Other comments:**

- a) Why has climate change scenario SSP5-8.5 been adopted in the GHD Preliminary Concept Drainage Strategy report? Is this scenario appropriate and consistent with climate change scenarios under consideration for the Croskell PSP?
- b) It is recommended that a further review be conducted of the ultimate drainage outfalls east of Clyde-Five Ways Road. Where appropriate and feasible, these designs should be incorporated into outfalls being delivered by these PSPs to reduce the footprint requirements of the ultimate drainage scheme retarding basins being proposed and/or improve the function of the ultimate wetlands adjacent to Clyde-Five Ways Road.

Upon further assessment of the PSP and the supporting reports, background studies, RORB, MUSIC and flood models that informed the PSP, it is envisaged that additional feedback will be provided regarding MPG's land holdings. Expert witnesses will be engaged to represent MPG at the Standing Advisory Committee and it is anticipated that other issues with the PSP and supporting documents, will be identified.

If you have any queries regarding this submission, please contact the undersigned on the details below.

Yours faithfully,

**for REEDS CONSULTING PTY LTD**

[Redacted signature block]

*Enclosed: Reeds Planning Landowner submission letter dated 26<sup>th</sup> March 2025*

**TABLE 1: Initial Planning Review - PSP**

Version: 1  
 Date: 26/03/2025  
 Parcel Number: CF-23 and CF-13  
 Document Reviewed: Casey Fields South (Employment) & Devon Meadows Precinct Structure Plan

PAGE No.	REFERENCE	SUBJECT	MATTER	REMARKS & REQUESTED AMENDMENTS
21	R4	Potential realignment of Clyde-Five Ways Road	The reference to the realignment of Clyde-Five Ways Road does not appear to be depicted on Plan 4 – Movement Network.	VPA to clarify extent of proposed realignment of Clyde-Five Ways Road in R4 and on Plan 4.
23	Plan 4	Movement Network	The Connector Road shown on Parcel C24 appears to lie on the title boundary of CF-23 and CF24, however as Plan 4 is unclear, it is not clear if this is the case.	VPA to clarify location of Connector Road and advise if future development on CF-23 will have frontage to the E-W Connector Road on Parcel CF-23.
26-28	Table 4	Employment Areas Planned Outcomes	Each of the different uses/development described in the table (i.e. mixed business and industry, light industry and industry for CF-23) contain a ‘purpose’. The applied zones for these uses/development are Commercial 2 Zone, Industrial 3 Zone, and Industrial 1 Zone also contain a ‘purpose’ in the relevant Clause of the planning scheme.	VPA to confirm that the purposes listed in the PSP do not conflict with those listed in the relevant Planning Scheme clause. This will avoid issues when dealing with permit applications in future with council.
30	O14	Cultural Heritage	Statement: <i>“To contribute to the protection and integration of <u>areas of cultural heritage and living cultural values</u> throughout the precinct.”</i>	VPA to clarify that this only applies to land that contains cultural heritage sensitivity and not all parcels. Identification of cultural heritage should be through a CHMP and only on parcels that trigger a CHMP through falling within an area of cultural heritage sensitivity.
31	R11	Canopy Tree Cover	Statement: <i>“Canopy tree coverage within the public realm must achieve a <u>minimum of 30% coverage</u> (excluding areas dedicated to biodiversity, native vegetation conservation, and drainage assets).”</i>	MPG requests that 30% be a target figure and not be mandatory and be subject to assessment on a case-by-case basis. Applying a blanket 30% tree cover in an employment area may be difficult to achieve and considered excessive.  VPA to also outline how the “minimum of 30%” is measured. Is this based on total land area, the net developable area or just the landscaped area? PSP to be amended to clarify.
32	G23	Canopy Tree Cover	Statement: <i>“Canopy trees should have an average canopy foliage of 6.4m in diameter at maturity in summer. Where this cannot be achieved because of local climate and soil conditions, a suitable species should be selected which closest achieves this canopy cover, to the satisfaction of the responsible authority. The requirement for a <u>minimum 30% canopy tree coverage within the public realm</u> must still be met.”</i>	MPG requests that 30% be a target figure and not be mandatory and be subject to assessment on a case-by-case basis. Applying a blanket 30% tree cover in an employment area may be difficult to achieve and considered excessive.  The VPA must provide a definition of what comprises “public realm”. Then once this is established an appropriate regime of vegetation, planting, maintenance can be outlined.
32	G24		Statement: <i>“Subdivision and development should provide opportunities for integrated Water Management where practical, including mechanisms to:                      a) reduce reliance on potable water                      b) enable future harvesting and/or treatment and re-use of stormwater (e.g. through passive irrigation)                      c) maximise habitat values for local flora and fauna species.                      d) protect and manage environmental values in relation to water quality and suitable hydrological regimes (both surface and groundwater).                      e) <u>recognise and respond to Aboriginal cultural values.</u>”</i>	VPA to clarify how an IWMP can provide recognition and respond to aboriginal cultural values. If aboriginal values are found on site through a CHMP, then this should be recognised and responded to via management conditions on the CHMP and not an IWMP.
35	Plan 5	Public Realm	Location of CF-LP-02. CF-LP-02 is located across two properties which only serves to cause issues with the delivery of the asset between developers.	0.03ha of CF-LP-02 has been allocated to be provided on Parcel CF-23 with the bulk of the local park to be provided on the parcel to the west. To avoid future delivery issues and potential disputes between landowners, MPG requests that the entire park is located within parcel CF-20. This is a logical change to the PSP and will have a negligible impact on CF-20.
36	Plan 6	Water	Size and shape of CF-RB-02 and CF-RB-04 are considered excessive.	VPA/MW to undertake further detailed analysis to reduce the provision of waterway and drainage assets on CF-23 given that the land use budget indicates a developable area of only 48.6% of the total area of the property. Such an imposition from a net developable area perspective is inequitable and therefore compensation should be provided to MPG to account of the loss of developable land. Further details will be provided by MPG on this matter once an Expert Witness has been engaged and assessments undertaken.
42	Plan 8	Employment and Activity Centres	Plan 8 depicts a large waterway in the east of the site that is setback from Clyde-Five Ways Road. This creates a strip of unusable land that has no road access and is too shallow in depth to allow for any meaningful uses to be located on the site.	Should the eastern waterway on CF-23 be retained, then it must be shifted eastwards to fully abut Clyde-Five Ways Road so as to remove the unusable strip of land that Plan 8 creates.
42	Plan 8	Employment and Activity Centres	The Legend depicts a ‘major town centre’ yet a MAC does not appear on the plan within the Precinct Boundary	VPA to update map to depict MAC as being external to the Precinct Boundary.
43	R21	Infrastructure Coordination	Statement:	VPA to update R21 to allow a small degree of flexibility, as utilities are occasionally required in waterway corridors. Update suggested:

Draft for Consultation – March 2025

			<p><i>"Utilities and other infrastructure must not cross conservation areas and waterway corridors identified in Plan 5 Public realm and Plan 6 Water. 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."</i></p>	<p><i>"Utilities and other infrastructure must not cross conservation areas and waterway corridors identified in Plan 5 Public realm and Plan 6 Water, unless otherwise agreed to by the Responsible Authority. 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."</i></p>
44	R27	Infrastructure Coordination	<p>Statement:  <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 Plan 9 Infrastructure and Development Staging and Table 8 Water infrastructure must be delivered unless otherwise agreed to in writing by Melbourne Water and the responsible authority."</i></p>	<p>In the context of CF-23, O3 adjoins the subject site and MPG requests that interim arrangements be permitted so as not to cause delay on future land subdivisions.</p>
62	Table 11	Land Use Budget	<p>CF-23 has 0.03ha of land allocated as local park</p>	<p>MPG requests that VPA amend land use budget to remove 0.03ha of local park from CF-23, as noted above against the comments for Plan 5.</p> <p>Clarification to be provided regarding the timing of compensation for the PAO land (0.30ha) on Parcel CF-13 and if the funding will be provided by the PSP.</p>
69	Plan 13	Native Vegetation Retention and Removal	<p>Connector Road on CF-24 appears to contain <i>"vegetation patch to be retained"</i>.</p>	<p>To facilitate the orderly delivery of the Connector Road on CF-24, MPG requests that Plan 13 be amended to allow vegetation within proximity of this future road to be removed.</p>
71	Plan 14	Bushfire	<p>Plan 14 depicts future <i>"grassland"</i> as a result of the creation of waterways in the PSP which have <i>"indicative 19m setback"</i>.</p>	<p>The inclusion of the future grasslands and 19m setbacks on Plan 14 without any further explanation or justification for this being provided in the PSP, is unwarranted.</p> <p>This is an infill site that has historically been farmed and will soon be developed into a range of commercial, business, industrial and other uses. Ongoing reference to bushfire hazards in the PSP presents an unnecessary constraint on development with burdensome setbacks and BAL ratings that ultimately achieve nothing given the lack of bushfire hazard.</p> <p>VPA to justify why the <i>"grasslands"</i> have been allocated to the land, when parts of these future drainage and waterway reserves will contain waterbodies and will not create a bushfire hazard as has been the case as waterways have been developed across wider Melbourne for decades.</p> <p>Furthermore, VPA to remove requirement for 19m setback as this should be determined through a bushfire assessment which is required under Section 3 of the draft Schedule 15 to the UGZ for land subdivisions.</p> <p>MPG also notes that draft UGZ15 refers to a <i>"bushfire hazard area shown on Plan 8"</i> yet Plan 8 does not make specific reference to a <i>"bushfire hazard"</i>.</p>

**TABLE 2: Initial Planning Review – Schedule 15 to Clause 37.07 Urban Growth Zone**

Version: 1  
 Date: 26/03/2025  
 Parcel Number: CF-23 and CF-13  
 Document Reviewed: Urban Growth Zone – Schedule 15 (Clause 37.07)

PAGE No.	REFERENCE	SUBJECT	MATTER	REMARKS & REQUESTED AMENDMENTS
8	Section 3	Bushfire Management Plan	The draft UGZ15 refers to a “bushfire hazard area shown on Plan 8” yet Plan 8 does not make specific reference to a “bushfire hazard”.	VPA to update reference to “bushfire hazard” to correctly reference the PSP and any relevant plans.
9	Section 3	Sodic and Dispersive Soils Management Plan	The draft UGZ15 requires any application to subdivide land or construct or carry out bulk earthworks to undertake a Sodic and Dispersive Soils Management Plan.	The applicant requests justification from the VPA as to why this is being applied as a blanket requirement for all land in the PSP, when historically the surrounding land did not have this requirement.
10	Section 4	Bushfire Management Plan	The draft UGZ15 refers to a “bushfire hazard area shown on Plan 8” yet Plan 8 does not make specific reference to a “bushfire hazard”.	VPA to update reference to “bushfire hazard” to correctly reference the PSP and any relevant plans.

**TABLE 1: Initial Planning Review - PSP**

Version: 1  
 Date: 26/03/2025  
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Draft for Consultation – March 2025

			<p><i>"Utilities and other infrastructure must not cross conservation areas and waterway corridors identified in Plan 5 Public realm and Plan 6 Water. 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."</i></p>	<p><i>"Utilities and other infrastructure must not cross conservation areas and waterway corridors identified in Plan 5 Public realm and Plan 6 Water, unless otherwise agreed to by the Responsible Authority. 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."</i></p>
44	R27	Infrastructure Coordination	<p>Statement:  <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 Plan 9 Infrastructure and Development Staging and Table 8 Water infrastructure must be delivered unless otherwise agreed to in writing by Melbourne Water and the responsible authority."</i></p>	<p>In the context of CF-23, O3 adjoins the subject site and MPG requests that interim arrangements be permitted so as not to cause delay on future land subdivisions.</p>
62	Table 11	Land Use Budget	<p>CF-23 has 0.03ha of land allocated as local park</p>	<p>MPG requests that VPA amend land use budget to remove 0.03ha of local park from CF-23, as noted above against the comments for Plan 5.</p> <p>Clarification to be provided regarding the timing of compensation for the PAO land (0.30ha) on Parcel CF-13 and if the funding will be provided by the PSP.</p>
69	Plan 13	Native Vegetation Retention and Removal	<p>Connector Road on CF-24 appears to contain <i>"vegetation patch to be retained"</i>.</p>	<p>To facilitate the orderly delivery of the Connector Road on CF-24, MPG requests that Plan 13 be amended to allow vegetation within proximity of this future road to be removed.</p>
71	Plan 14	Bushfire	<p>Plan 14 depicts future <i>"grassland"</i> as a result of the creation of waterways in the PSP which have <i>"indicative 19m setback"</i>.</p>	<p>The inclusion of the future grasslands and 19m setbacks on Plan 14 without any further explanation or justification for this being provided in the PSP, is unwarranted.</p> <p>This is an infill site that has historically been farmed and will soon be developed into a range of commercial, business, industrial and other uses. Ongoing reference to bushfire hazards in the PSP presents an unnecessary constraint on development with burdensome setbacks and BAL ratings that ultimately achieve nothing given the lack of bushfire hazard.</p> <p>VPA to justify why the <i>"grasslands"</i> have been allocated to the land, when parts of these future drainage and waterway reserves will contain waterbodies and will not create a bushfire hazard as has been the case as waterways have been developed across wider Melbourne for decades.</p> <p>Furthermore, VPA to remove requirement for 19m setback as this should be determined through a bushfire assessment which is required under Section 3 of the draft Schedule 15 to the UGZ for land subdivisions.</p> <p>MPG also notes that draft UGZ15 refers to a <i>"bushfire hazard area shown on Plan 8"</i> yet Plan 8 does not make specific reference to a <i>"bushfire hazard"</i>.</p>

**TABLE 2: Initial Planning Review – Schedule 15 to Clause 37.07 Urban Growth Zone**

Version: 1  
 Date: 26/03/2025  
 Parcel Number: CF-23 and CF-13  
 Document Reviewed: Urban Growth Zone – Schedule 15 (Clause 37.07)

PAGE No.	REFERENCE	SUBJECT	MATTER	REMARKS & REQUESTED AMENDMENTS
8	Section 3	Bushfire Management Plan	The draft UGZ15 refers to a “bushfire hazard area shown on Plan 8” yet Plan 8 does not make specific reference to a “bushfire hazard”.	VPA to update reference to “bushfire hazard” to correctly reference the PSP and any relevant plans.
9	Section 3	Sodic and Dispersive Soils Management Plan	The draft UGZ15 requires any application to subdivide land or construct or carry out bulk earthworks to undertake a Sodic and Dispersive Soils Management Plan.	The applicant requests justification from the VPA as to why this is being applied as a blanket requirement for all land in the PSP, when historically the surrounding land did not have this requirement.
10	Section 4	Bushfire Management Plan	The draft UGZ15 refers to a “bushfire hazard area shown on Plan 8” yet Plan 8 does not make specific reference to a “bushfire hazard”.	VPA to update reference to “bushfire hazard” to correctly reference the PSP and any relevant plans.