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31 March 2025

Mat Garner
Director, South Easter Metropolitan
Victorian Planning Authority
Department of Transport and Planning

Via: Email Mat.Garner@vpa.vic.gov.au

Dear Mat,

**Re - Casey Fields South (Employment) and Devon Meadows
Precinct Structure Plan
165 – 215 Clyde Five-Ways Road, Clyde**

KLM Spatial acts on behalf of Galileo Clyde Fiveways Pty Ltd in providing the following response to the exhibited Draft Casey Fields South (Employment) and Devon Meadows Precinct Structure Plan ('the PSP'). Galileo Group is an independent Australian development group with many successful greenfield developments in Melbourne's south-east.

Galileo has a long-held interest in the development of the Casey Fields precinct. KLM Spatial working with Galileo Group brought together land owners throughout the precinct from 2018 to lobby for the preparation of the PSP and resulting in the current funding agreements signed with the VPA in 2022 enabling the preparation of the PSP.

During this time Galileo prepared specialist reporting and concept plans developing a detailed knowledge and nuanced understanding of land form, hydrology and utility services across the precinct. These concepts and background information were regularly shared with the VPA during this time.

We continue to appreciate the facilitative and consultative approach of the VPA throughout the preparation of the PSP and during the exhibition period, including the series of recent meetings convened with Melbourne Water to discuss the Drainage Services Scheme. Our submission builds upon these recent discussions.

Our comprehensive submission is intended to provide logical and practical commentary to enable the actual delivery of employment land and jobs in the City of Casey. Our commentary proposes practical solutions to enable efficient delivery of the drainage scheme and appropriate urban form for an industrial precinct.

We seek to support the VPA's vision for Casey Fields to -

Deliver a flexible, next generation employment precinct...

We provide the following summary of our key positions on the Draft PSP -

- The centre piece of our submission is an alternative drainage scheme which provides for efficiency of stormwater outfalls and assets with a guaranteed outfall to enable land delivery by:
 - Combining outfalls 01 and 02 with an outfall at 01 secured by a Public Acquisition Overlay (PAO),
 - Providing an efficient wetland within a natural low lying basin connecting to the PAO outfall that will reduce total wetland area by approximately 45% and service 85% of land in the Casey Fields South precinct,

- Applying a PAO to the proposed alternative wetland to ensure certainty of delivery for employment land and local jobs.

Incitus and Afflux Consulting are currently finalising a separate submission that will provide validation of the proposed alternative drainage strategy. We anticipate this technical detail will be available within the coming weeks.

The high level alternative drainage scheme has been presented to the City of Casey and neighbouring land owners with positive initial responses. It is anticipated that these discussions will continue.

- The proposed Infrastructure Staging Plan unnecessarily restricts land delivery and the incentive for developers to work together to deliver key assets. We maintain that the Casey Fields precinct is of a size to be a single stage PSP, but if staging must be included we suggest the southern Investigation Area be identified as Stage 2. The need to provide a drainage outfall for each catchment will practically contain development without the need for staging along catchment boundaries.
- We support the robust street network proposed including the extension of Moore Road and signaled intersections located in the vicinity of the Galileo land.
- We oppose any limitation on direct property access along Employment Avenues. Efficient and direct access must be provided on these key road spines within the precinct to enable access for commercial deliveries, customers and staff. Direct frontage access is necessary in industrial precincts which have different access requirements and building typology to multi-visit activity centres.
- The linear parks along Employment Avenues are not practical to implement and restrict efficient property access. Instead, we propose an alternative Local Park (CF_LP_03) within the Galileo land that will protect existing native vegetation, potential cultural heritage values and provide an attractive hilltop feature for workers and the adjacent residential area.
- Lot size along Employment Avenues should not be restricted to small and medium size businesses, as direct access to large premises with substantial vehicle volumes may be ideally suited to the spine roads. Industrial uses are better suited to the core of the precinct maximizing distance to surrounding residential areas.
- Road cross sections provided within the PSP should reflect standard VPA cross sections for industrial precincts and make adequate allowance for parking along both Connector and Local Access Streets.
- A Temporary Sewer Rising Main along Clyde - Fiveways Road as proposed in the background reporting should be shown in the PSP Plan 6 Water.
- The PSP process provides the opportunity to co-ordinate native vegetation removal with infrastructure delivery and reasonable development under Clause 52.16. This avoids vegetation assessment at the time of permit application and hastens the approval process. We request amendment of Plan 13 Native Vegetation Retention and Removal to show acceptable vegetation removal as proposed. Further information will be provided to the VPA regarding this item.
- We are seriously concerned that no details of the Infrastructure Contribution Plan have been shared with landowners. The ICP is a fundamental element of land development and financing and ultimately PSP implementation. We request ICP documentation and background reporting be made publicly available.

Galileo land

The Galileo land comprises 165 and 215 Clyde-Fiveways Road having a total of 45 hectares. The land rises from south-west to north-east. The southern land parcel is used for market gardens with the northern parcel is utilized for grazing. A single house exists on both land parcels along with various outbuildings and a dam on both properties. The land is predominantly cleared with an area of native vegetation located along the Clyde-Fiveways Road either side of the boundary of both lots. The southern lot has frontage to South Gippsland Highway and the south boundary aligns with Moores Road. The land is located to the south-east of the Casey Fields South precinct and comprises slightly less than 20% of the precinct area.



Figure 1: Galileo land

Source: Nearmap 4/2/2025

A. Alternative Drainage Scheme

The drainage scheme underlies the delivery of the precinct as a key enabler of land development. It is imperative that the scheme for the precinct provides accessible outfalls and efficiency of stormwater treatment and retardation. We support the initiative of Melbourne Water and the VPA to apply a PAO to secure the outfall connection O1 extending east of the precinct to Rutherford Creek.

However, we consider the lack of a secure outfall at O2 to Rutherford Creek is a major inhibitor to the development of approximately 75% of the precinct north of Moore Road. The existing culvert at Moore Road disperses across neighbouring farmland. The absence of a secured outfall will prevent and frustrate the delivery of land and jobs across the core of the precinct.

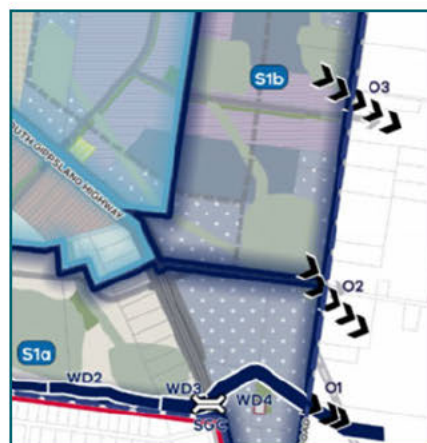


Figure 2: From Plan 9 Infrastructure & Development Staging, Draft CFSDVSP. Outfalls as numbered

Galileo presents an alternative drainage strategy intended to provide for efficiency of drainage outfall and assets with a guaranteed outfall to unlock land development by way of:

- Combining outfalls 01 and 02 with an outfall at 01 secured by the PAO by diverting drainage from the central northern catchment to the south of the proposed Moore Road extension,
- Providing an efficient wetland within a natural low lying basin area connecting to the PAO outfall and extending the PAO to include this wetland,
- Providing primary treatment upstream prior to stormwater entering the channel system,
- Locating the alternative wetland within a location that is largely impacted by a Land Subject to Inundation Overlay,
- Realigning of waterways north of the Moore Road extension to direct drainage to the alternative wetland, and
- Producing land efficiencies for 215 and 235 Clyde-Fiveways Road and 1805 South Gippsland Highway through the alternative wetland proposal.

The alternative drainage scheme achieves an approximate **40% reduction of wetland area** and a minor reduction of waterway length, as well as requiring two rather than three outfalls. The wetland would provide stormwater retardation for approximately 85% of the Casey Fields South precinct, only excluding the small catchment to the north-east of the precinct.

The significance of the proposed wetland provides appropriate justification that a **PAO should be applied to the wetland area**. This will enable certainty of delivery and enable the wetland to be constructed concurrently with outfall 01. This would unlock developable land in the precinct and may avoid temporary drainage works.

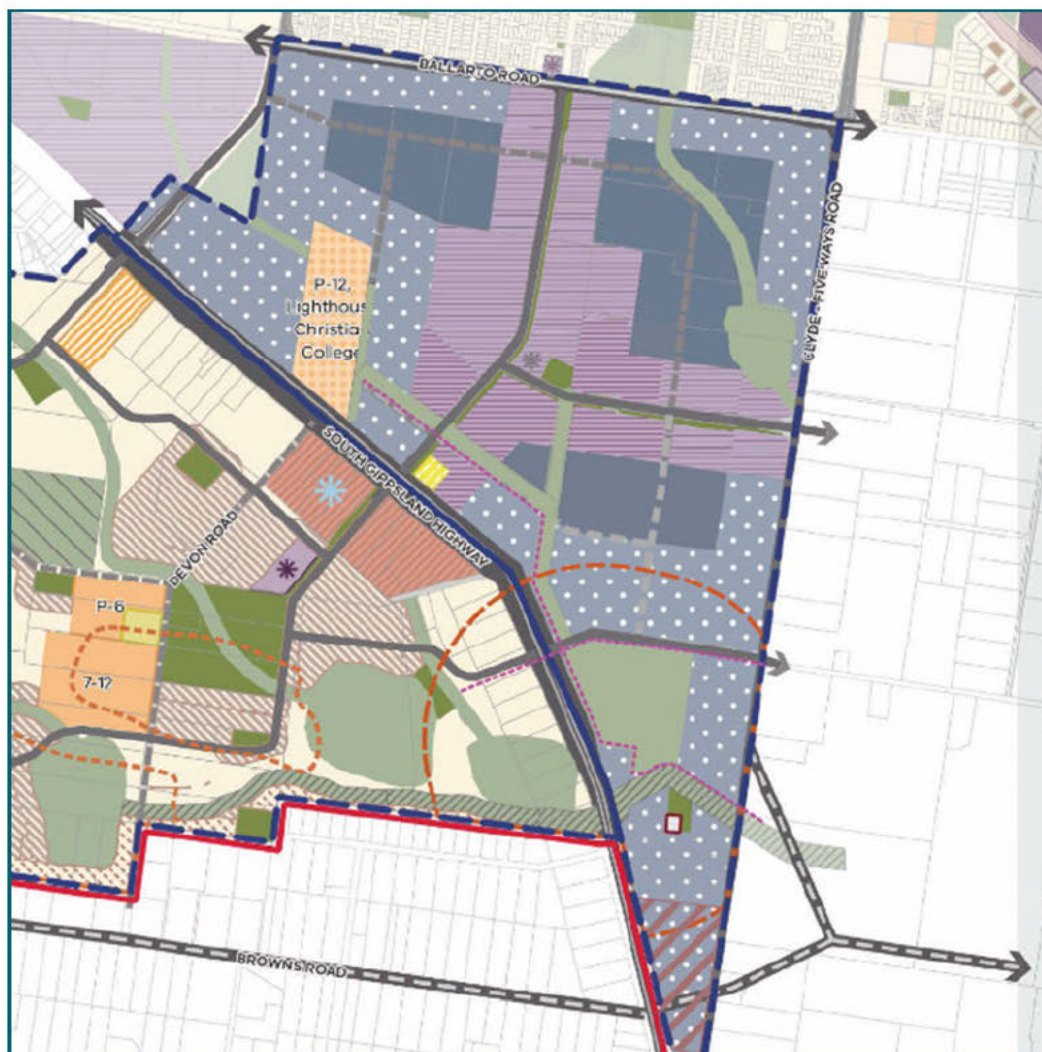


Figure 3: Alternative Drainage Concept

Refer Appendix A for complete plan & legend

The image below illustrates the alternative drainage scheme with contours overlaid (reference numbers in image below) –

1. The alternative wetland is proposed within a natural basin of low-lying topography generally lies at 24AHD to 25AHD. Also refer photograph below.
2. The area of the Draft PSP wetland in the Galileo land rises from 24AHD to 31AHD which would require substantial cut into a hillside for construction.
3. The topography of 235 Clyde-Fiveways Road would also require substantial modification to achieve the PSP proposed wetland in that property.
4. The shortened waterway alignment to the alternative wetland is shown. (refer yellow arrow).



Figure 4: Alternative Drainage Concept with contours - indicating levels within the Draft PSP wetlands shown by green dash



Figure 5: Proposed alternative low lying wetland location (1) from south-west Streetview 2025

Alternative drainage scheme further considerations

The proposed site responsive wetland location has a number of other benefits for the developing Casey Fields precinct, embracing Purpose 3 and 5 of the Draft PSP to -

Deliver an immersive and walkable residential community that blends modern urban living with natural landscape character.

Deliver an integrated network of waterways and open spaces that tell the story of country, effectively manage stormwater, provide amenity, and facilitate wildlife movement.

The proposed wetland location extends the 'chain of wetlands' proposed through Devon Meadows precinct eastward. This provides more opportunity for attractive open space with shared path linkages between the future Devon Meadows and Clyde South residential areas, as well as extending a 'low priority link' for South Brown Bandicoot and other native flora and fauna.

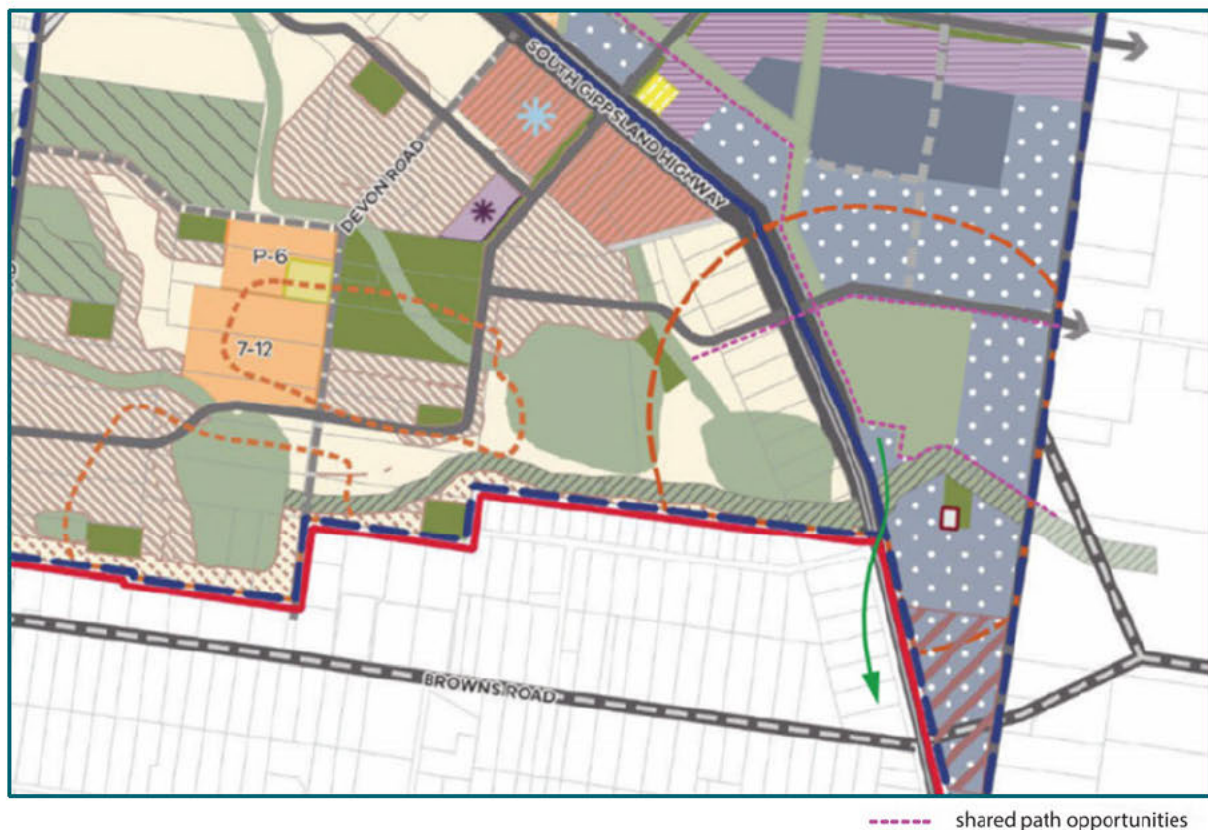


Figure 6: From Alternative Drainage Scheme

Note – Chain of wetlands

The proposed alternative wetland location allows a visual transition from urban to rural landscape by creating a large green space on the South Gippsland Highway close to the Urban Growth Boundary, resulting in an attractive gateway to South Gippsland, to accord with Purpose 1 of the PSP,

Create a distinct gateway destination that brings together the existing and planned communities of urban Melbourne with the rural interface with the Gippsland Region

The background studies prepared as part of the PSP indicate that the proposed construction of a wetland in this area;

- Does not contain any native vegetation (Refer PSP Plan 13 Native Vegetation Retention and Removal),
- Is not identified as having ecological significance but could form a low priority link for the Southern Brown Bandicoot (Refer Biodiversity Assessment Report, July 2023, WSP),

- Whilst mapping of areas of cultural heritage significance have been redacted from background reporting it is expected that the area is unlikely to have significance given its low lying land form, and
- Would reduce bushfire risk through efficiency of wetland provision within the wider precinct.

The development of this land for a wetland would negate the need for access to South Gippsland Highway or the Moore Road extension within proximity of a signalized intersection.

Should the proposed wetland area instead be developed for employment purposes as proposed in the PSP, the natural basin is likely to require in the order of 3 metres of fill to enable development. This will substantially increase site establishment cost and reduce desirability of developing the land. Fill estimate is provided by Afflux Consulting (further information to be provided separately).

Other Drainage items

R8 specifies that development applications must respond to a number of authority documents listed below. Given a DSS will be place the requirement for applicants to reference these documents is not necessary.

Subdivision and development must demonstrate the extent to which development will contribute towards:

R8

- outcomes identified in the DEECA Western Port Strategic Directions Statement (September 2018) and Western Port IWM Catchment Scale Plan (September 2022)
- outcomes identified in the Casey Fields South/Devon Meadows PSP: Integrated Water Management – Issues and Opportunities Report (Alluvium, Feb 2023)
- stormwater volume reduction and infiltration targets in Melbourne Water’s Healthy Waterway Strategy (2018) that are applicable to the PSPs
- potable water reduction targets outlined in the draft Greater Melbourne Urban Water and System Strategy, Water for Life, that are applicable to the PSPs
- waterways and integrated water management outcomes which enable land to be used for multiple recreation and environmental purposes

To the satisfaction of South East Water, Melbourne Water, and the responsible authority.

Instead, it is proposed that the PSP reference the relevant EPA best practice guidelines, as included in the Draft Croskell PSP (R27), as follows,

A Stormwater Management Plan must include Integrated Water Management solutions consistent with Plan 6 Water and the relevant Development Services Scheme (DSS) and achieve the objectives of the Best Practice Environment Management Guidelines (CSIRO, 1999) and the urban stormwater management guidance (EPA’s publication 1739).

R21 specifies that infrastructure ‘must’ not cross conservation areas and waterway corridors waterways. This is impractical as indicated in Plan 6 which shows the proposed sewer crossing multiple waterways. We suggest ‘must’ be replaced by ‘should’ as this better reflects the opportunity provided to vary this provision in the following sentence.

R28 proposes

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.

R28 Where it can be demonstrated that this is not possible, development proposals must demonstrate how any interim solution adequately manages flow rates, treats stormwater generated from the development (without causing adverse impacts to the other properties within or outside the precinct, the environment, cultural heritage, or other infrastructure), to the satisfaction of Melbourne Water and the responsible authority.

An interim solution will not be considered for assets WD1, WD2, WD3, SGC, WD4, O1, O2, O3. These assets must be delivered in their ultimate form.

Development construction and interim solutions must avoid or mitigate the risk of soil erosion and waterway degradation.

We consider the phrase ‘without causing impact to the other properties or outside the precinct, the environment, cultural heritage or other infrastructure’ is inappropriate as the merits of an alternative or temporary solution should give balanced consideration of any impacts. Further, it is the responsibility of the Registered Aboriginal Party as part of a Cultural Heritage Management Plan to determine the management of any cultural heritage. We suggest the phrase be amended to

‘having appropriate consideration of any impacts to other properties, the environment, and infrastructure’.

We suggest that R28 blanket prohibition of interim solutions for the various assets is misguided, as frequently interim solutions are acceptable to enable development to be initiated, or as a reasonable staged approach to deliver ultimate infrastructure. We do however, note that Melbourne Water will not reimburse interim solutions, and that this MW mechanism encourages the delivery of ultimate infrastructure where possible. We suggest the following wording be added,

An interim solution will generally not be considered for assets WD1, WD2, WD3, SGC, WD4, O1, O2, O3. These assets must be delivered in their ultimate form other than with the consent of Melbourne Water and the responsible authority.

A. Requested amendments to the PSP – Drainage Infrastructure

We seek the following amendments of the PSP to align with the alternative drainage scheme:

1. All PSP Plans 1-13 be amended to incorporate the alternative wetland and waterway configuration
2. Plan 6 Water - delete wetlands RB_01, RB_02 and RB_05
3. Plan 6 Water – Identify the alternative efficient wetland as RB_01
4. Plan 9 Infrastructure and Development Staging - Delete Outlet 02 and renumber Outlet 03
5. Table 8 Water Infrastructure – to be amended to reference to appropriate descriptors for the alternative scheme (alternative table to be provided separately)
6. Amend R8 to delete referenced documents and instead state,

A Stormwater Management Plan must include Integrated Water Management solutions consistent with Plan 6 Water and the relevant Development Services Scheme (DSS) and achieve the objectives of the Best Practice Environment Management Guidelines (CSIRO, 1999) and the urban stormwater management guidance (EPA’s publication 1739).

7. Amend R21 to ‘should not cross conservation areas and waterway corridors waterways’.
8. R27 and Plan 9 Infrastructure Development and Staging – amended to refer to alternative scheme.
9. R28 remove reference to Outlet 02
10. Amend R28 to replace ‘without causing impact to the other properties or outside the precinct, the environment, cultural heritage or other infrastructure’ with ‘having appropriate consideration of any impacts to other properties, the environment, and infrastructure’.

11. Amend R28 as follows,
An interim solution will generally not be considered for assets WD1, WD2, WD3, SGC, WD4, O1, O2, O3. These assets must be delivered in their ultimate form other than with the consent of Melbourne Water and the responsible authority.
12. Amend Table 9 Precinct Infrastructure to reflect the revised drainage infrastructure areas
13. Amend Table 10 to reflect the revised drainage infrastructure areas
14. Amend Table 11 Property Specific Land Budget to reflect the to reflect the revised drainage infrastructure areas.

B. Infrastructure Co-ordination

We consider Casey Fields South to be of a size (275 hectares) that constitutes a single stage employment precinct and that delivery of land will be development led and subject to the efficiencies of infrastructure delivery.

In comparison, the Casey Fields South precinct is approximately a third the size of the recently gazetted Officer South Employment PSP (1069 hectares) which was divided into three stages. Further, the Casey Fields PSP does not require the construction of bridges or major freeway intersections to accommodate vehicle volumes.

If the VPA is committed to staging the Casey Fields South precinct we suggest that the triangular Investigation Area to the far south of the precinct be nominated as Stage 2, given this area is yet to be given consideration and its development of this area will require:

- Resolution of the Clyde Fiveways intersection, and
- Construction of the Browns Road extension to Clyde.

Stage 1 as proposed in this submission contains two drainage catchments with proposed outlets O1 and O2. The necessity for a downstream outlet will effectively guide the development of the two catchments within the proposed Stage 1 precinct but does not otherwise need to be restrained by a stage boundary.

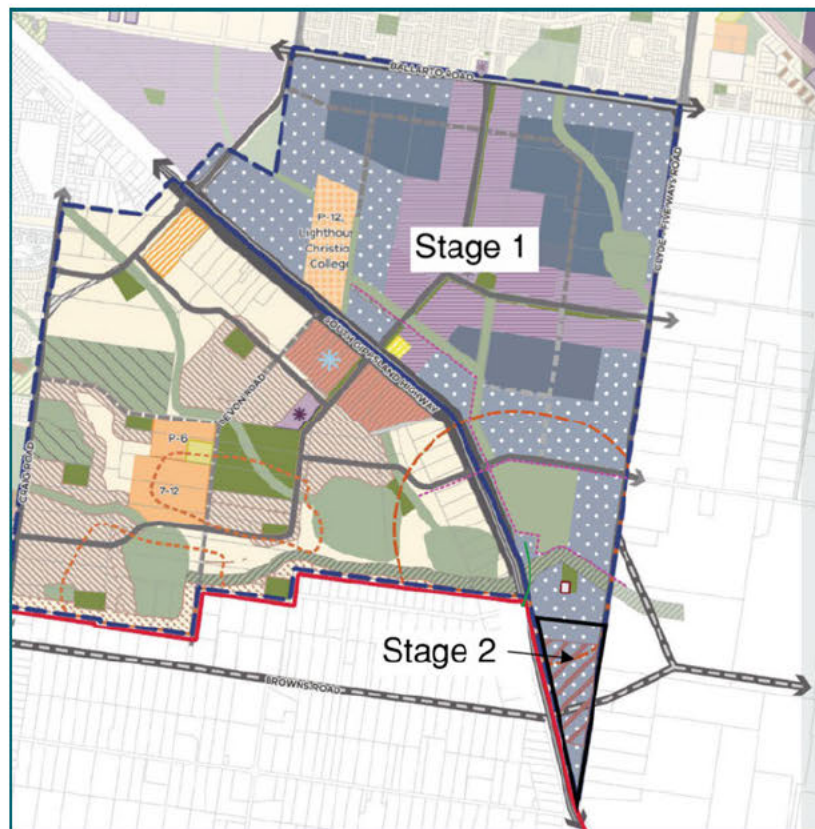


Figure 7: Alternative Staging Proposal

R27

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.

It is not considered for all listed assets within a stage need to be constructed prior to SOC, especially where drainage assets are within a separate drainage catchment. Instead, we suggest the wording of R27 be amended as below.

Prior to the issue of a statement of compliance in the Casey Fields South precinct appropriate downstream drainage infrastructure including Outlets O1 or O2 and Table 8 Water Infrastructure (to be amended with alternative scheme proposed TBA) must be delivered unless otherwise agreed in writing by Melbourne Water and the responsible authority.

Interim sewer infrastructure

A temporary sewer rising main along Clyde Fiveways Road, as proposed in the background reporting, is a practical approach to delivering sewer infrastructure to the employment precinct given the Manks Road alignment in Clyde South may not be developed for many years due to fragmented ownership in that precinct. We strongly request the temporary rising main be shown in the PSP on Plan 6 Water.

Similarly, we suggest the temporary pump station is preferably located adjacent to Clyde Fiveways Road to facilitate access rather than central to the land parcel.

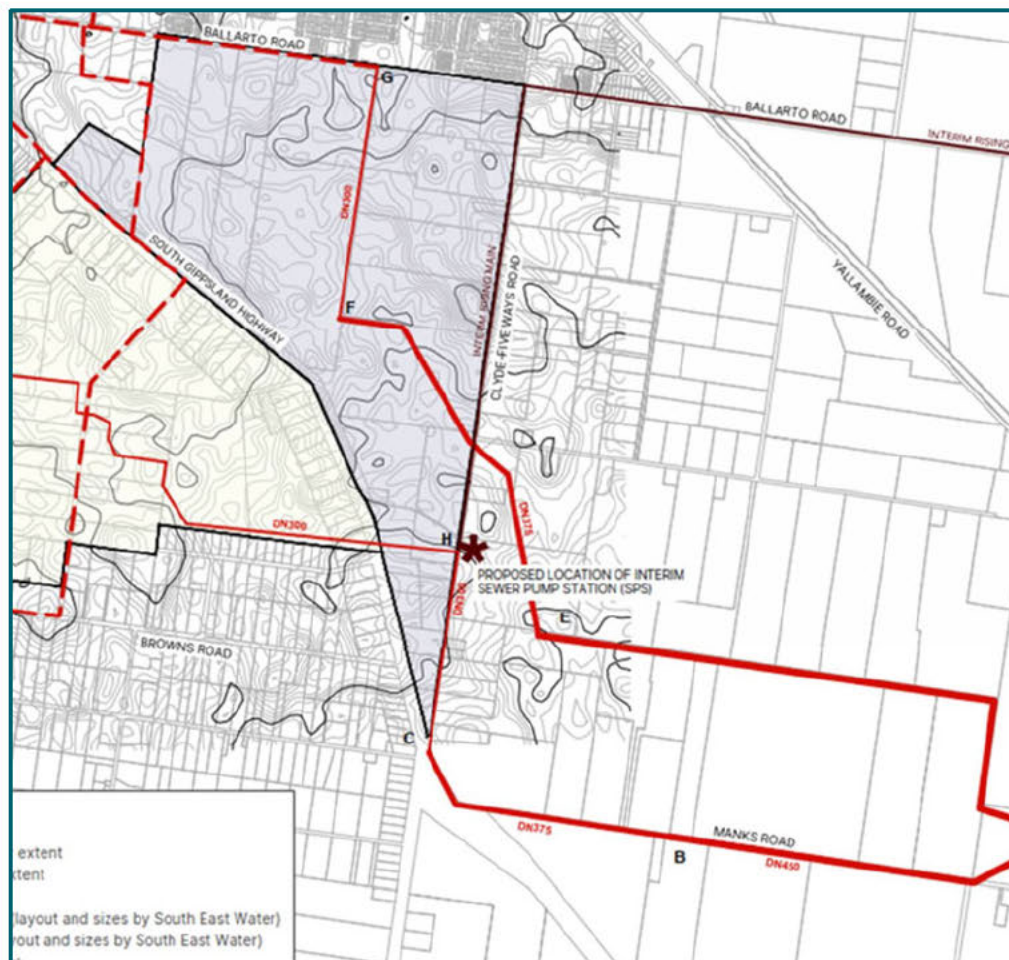


Figure 8: From High Level Utility Servicing Assessment, CFSDVPSP, June 2023, SMEC

B. Requested amendments to the PSP – Infrastructure Co-ordination

We seek amendment of the PSP as follows:

1. Amend Plan 9 Infrastructure and Development Staging to reflect the staging in Figure 7.
2. Amend Plan 6 Water to show a Temporary Sewer Rising Main along Clyde Fiveways Road and the Sewer Pump Station located adjacent to that road.
3. R27 be amended for Casey Fields South as follows,

Prior to the issue of a statement of compliance in the Casey Fields South precinct appropriate downstream drainage infrastructure including Outlets O1 or O2 and Table 8 Water Infrastructure (to be amended with alternative scheme proposed TBA) must be delivered unless otherwise agreed in writing by Melbourne Water and the responsible authority.

4. R28 be amended as follows,

An interim solution will generally not be considered for assets WD1, WD2, WD3, SGC, WD4, O1, O2, O3. These assets must be delivered in their ultimate form other than with the consent of Melbourne Water and the responsible authority.

C. Movement Network

The Draft PSP proposes a strong and robust network providing clear and direct access into and within the precinct with the potential to accommodate clear access routes for large commercial vehicles from the surrounding arterial road network. Signalised intersections are suitably located and well spaced along the surrounding arterial roads. Specifically, Galileo supports:

- The extension of Moore Road and signalised intersections at South Gippsland Highway and Clyde Fiveways Road, providing a key connection for the precinct and to the future Clyde South area,
- The Connector Street/Employment Avenue provided within and along the northern boundary of the Galileo land.
- A signalised T-intersection at the intersection of the above Connector Street and Clyde – Fiveways Road, particularly given the rolling topography of the road which could impact view lines if this intersection was to be unsignalized. Refer photograph below.

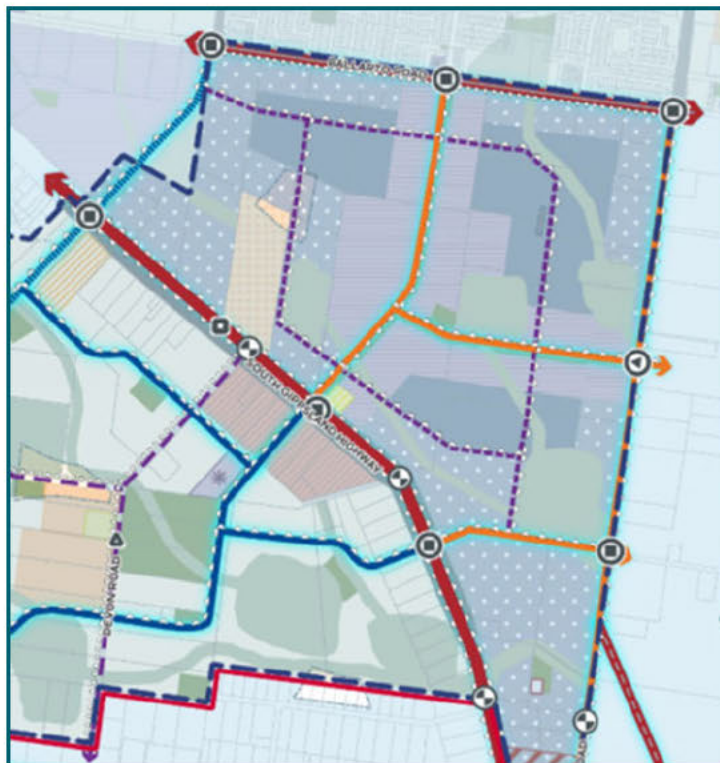


Figure 9: From Plan 4 Movement Network, Draft PSP



Figure 10: Clyde-Fiveways Road - crest to the south of the signalized T-intersection 17/2/22

Employment Avenues

We object to the otherwise well positioned Connector Streets/Employment Avenues having limited vehicle access and this is a serious failing of the PSP and lacks understanding of the operation of industrial precincts. Guideline G16 proposes,

Minimise vehicle access from Employment Avenue streets on Plan 4 Movement Network

We consider that this does not align with the overriding objective of 05,

To ensure the physical transport network is safe and efficient for its anticipated users

The limited access arrangement for Employment Avenues relates to the preferred urban form along Employment Avenues with a preference for zero-lot lines (G16)

Locate buildings with a zero-setback, and parallel to the frontage Employment Avenue streets shown on Plan 4 Movement network

Minimise gaps between adjacent buildings along frontages to Employment Avenue streets on Plan 4 Movement network

We believe the PSP is misguided in suggesting that the urban form along the Employment Avenues will be similar to a Main Street or Activity Centre precinct with zero-lot lines, noting the Clyde Major Activity Centre where such businesses are likely to locate is proposed a short distance to the north-east. These guidelines do not reflect the form of a typical industrial precinct or industrial type land use need.

A Regional Significant Industrial Precinct (RSIP) must prioritise ease of commercial vehicle access especially for large vehicles on Connector Streets rather than limiting access and directing large vehicles to access via narrower lower level streets. We accept that direct access may not be desirable from arterial roads around the precinct, but Connector Streets should prioritise access to properties.

Melbourne Industrial Commercial Land Use Plan (MICLUP 2020) in Planning for the Southern Region proposes,

Retain industrial land at Clayton South..... and Casey Fields South predominately for industrial uses, limit encroachment by other uses that would fragment this land and protect them from encroachment of sensitive uses that may compromise development and efficient operation of businesses in these locations.

Investigate and identify areas within regionally-significant industrial precincts that could support other employment uses, including offices, creative industries and start-ups, that support or are well connected to adjacent employment uses or transport connections.

MICLUP clearly identifies that Casey Fields precinct is primarily intended for industrial use but that there may be other complementary employment uses. We do not consider that MICLUP foreshadows that industrial use should be subverted by the complementary uses on all key routes in the precinct. Importantly, MICLUP notes the importance of ensuring efficiency of business operations which can in part be achieved by direct vehicle access.

We refer to the urban form in the nearby Clyde North industrial precinct, where direct access is provided from the key route through the precinct, and the industrial urban form provides car parking to the front of premises. Most businesses in an industrial precinct require ease access for deliveries and pickups which is provided by a front car park. Zero lot lines can also cause difficulty for the connection of utility services to premises. Refer to following images of Clyde North.



Figure 11: Hammersley Drive Clyde North with front car parking Streetview 2023



Figure 12: Clyde North industrial precinct Note direct access to key routes & parking at property frontages Nearmap 4/3/2025

Local Streets

We consider it is undesirable to identify Local Access Streets in the Movement Network Plan as local access will be largely determined by preferred lot size and the progress of development in the precinct. Connectivity within the precinct is important but local road location can be determined at the application stage.

It may be desirable, however, for the northern east-west Local Access Street to be upgraded to a Connector Street to improve precinct access to the future Casey Fields Boulevard, as indicated in the image below

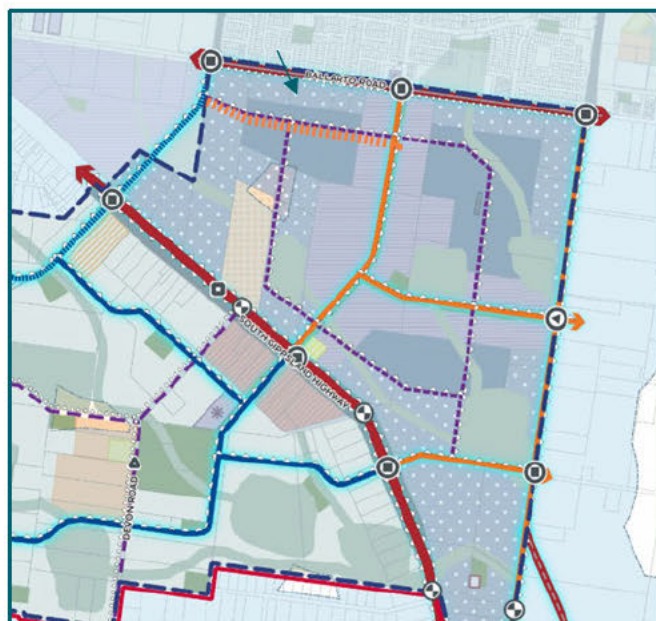


Figure 13: Movement network plan with additional east-west Connector Street indicated

Road Cross sections

The Draft PSP includes several road cross sections that do not provide for on-road car parking. Despite on-site provision of parking for businesses in industrial precincts it is common place for on-street parking to be utilized, as shown in the image below. The planned absence of dedicated on-street parking lanes will not prevent parking on-street but will instead impact the passing of vehicles and efficiency of access. The cross sections proposed in the PSP do not accord with the cross sections approved by Casey Council in employment areas elsewhere in the municipality. Whilst the cross sections may be varied it is considered inappropriate to include cross sections that provide for poor access and lack car parking.



Figure 14: Clyde North employment precinct showing propensity of on-street car parking Streetview 2023

C. Requested amendments to the PSP – Movement Network

We seek amendment of the PSP as follows:

1. Amend Plan 4 Movement Network to:
 - Delete Local Access Streets on plan
 - Include a new east-west Connector Street to Casey Fields Boulevard as indicated in Figure 12.
2. Amend G16 by deleting the following dot point
 - *Minimise vehicle access from Employment Avenue streets on Plan 4 Movement network*
3. Delete Connector Street Employment Avenue cross section which does not provide for car parking.
4. Delete Limited Access Connector Street cross section which includes an unnecessary Loop Road adjacent to the Connector Street.
5. Delete Local Access Street – Employment Service Loop which does not include car parking lanes, and replace with standard 'Local Access Street – Level 2 (Industrial)' as per Officer South Employment PSP, increasing the cross-section width from 20m to 22m and noting that an off road bike path is not included. Refer following image

Local Access Street Level 2 – Industrial (22m)

VPA Standard Cross Section

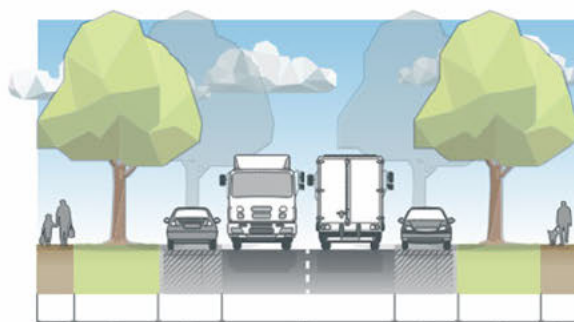


Figure 15: Standard VPA local Access Street Connector Level 2 Industrial – 22 metres

D. Connect people to jobs and higher order services

Further to previous comments the PSP should provide for industrial urban form and confuse the urban form with that of an activity centre where multi-purpose trips are likely and results in a compact urban form typical of a shopping centre.

We strongly object to G13 which gives statutory weight to City of Casey Employment Land Design Guide 2022 and City of Casey Restricted Retail Design Guide 2023. These documents are not incorporated or referenced in the Casey Planning Scheme and have not undergone a statutory exhibition phase. Council's website indicates that the documents are intended to be resources for applicants only.

G13

Subdivision and development involving the delivery of employment land should be in accordance with the City of Casey *Employment Land Design Guide 2022* and, where relevant, the City of Casey *Restricted Retail Design Guide 2023* (or subsequent revisions).

We do not support the contention in G16 below that Employment Avenues should primarily provide for small and medium size tenancies. Large land uses may well be attracted to these key routes due to ease of access from surrounding arterial roads.

- Encourage small to medium scale tenancies and land uses to locate along Employment Avenue streets shown on Plan 4Movement network to allow a greater number of uses to present to the street

As outlined in the previous section, we do not support mandating zero lot lines (G16) on the Employment Avenues as this is not typical of industrial built form but is more akin to a multi-visit Activity Centre.

- Locate buildings with a zero-setback, and parallel to the frontage Employment Avenue streets shown on Plan 4Movement network

Industrial areas contain many varied uses and building form. Given the likely variety of form and function it is not considered necessary to provide a common building setback for each street as specified in G17. Some uses will require larger car parks which then determine an appropriate setback for the building..

G17

- Provide a common building setback for each street

Mixed Business and Industry

Purpose

The purpose of the Mixed Business & Industry area is to provide a commercially focused core made up of a blend of larger and smaller sized lots with good access to surrounding industries and providing high levels of public amenity.

The area is envisaged as a contemporary style of business development characterised by compact and walkable built form and activated public realm that feels distinctly urban.

The second part of the Purpose is unclear. A compact and walkable built form is unlikely to be achieved across the Mixed Business and Industry area. This objective is more akin to an Activity Centre which may attract multi-purpose trips. A 'public realm that feels distinctly urban' is likely to occur in any built environment and is not a useful descriptor.

As previously indicated, we consider that it is not desirable to only encourage small and medium size businesses along the Employment Avenues. It is preferable that industrial uses establish in the core of an industrial zone to maximise distance to surrounding residential areas.

Planned outcomes

Decision guidance

Activities that locate along key entry streets will generally be expected to address the street directly to support the higher-amenity character, and pedestrian-focused street environment.

Subdivision and development in the Mixed Business & Industry area should:

- **Encourage small to medium scale** mixed industry and business uses to establish along the key entry streets and at the core of the precinct

D. Requested amendments to the PSP – Connect people to jobs and higher order services

We seek amendment of the PSP as follows:

1. Amend PSP Plan set to show Light Industrial land in the area of wetland CF_RB_05
2. Delete G13 which references the City of Casey Employment Land Design Guide 2022 and City of Casey Restricted Retail Design Guide 2023
3. Amend G16 to delete the following dot points
 - *Encourage small to medium scale tenancies and land uses to locate along Employment Avenue streets shown on Plan 4 Movement network to allow a greater number of uses to present to the street*
 - *Locate buildings with a zero-setback, and parallel to the frontage Employment Avenue streets shown on Plan 4 Movement network*
 - *Minimise vehicle access from Employment Avenue streets on Plan 4 Movement network*
4. Amend G17 to delete
 - a. *Provide a common building setback for each street*
5. Amend Mixed Business and Industry Purpose to delete
 - b. *characterised by compact and walkable built form and activated public realm that feels distinctly urban*
6. Amend Mixed Business and Industry Planned Outcome to delete
 - *Encourage small to medium scale, mixed industry and business uses to establish along the key entry streets and at the core of the precinct*

E. High Quality Public Realm

The PSP proposes unconventional linear open space on the south side of the Employment Avenue along the northern boundary of the Galileo land. The linear open space will be impractical to deliver and will avoid direct access to properties which is contrary to PSP Objective 05. Any crossing of the linear open space would require cumbersome easements for vehicle crossing and utility connections to lots which would unlikely be supported by servicing authorities. The Employment Avenue within the Galileo land will visually benefit from the wetland located adjacent to Clyde-Fiveways Road.

The proposed linear open space CF_LP_03 has an area of 8400m² within the Galileo land. We suggest that this creditable open space within 215 Clyde Fiveways Rd be located in the area of native vegetation identified for retention in Plan 13. This will provide for improved protection of the vegetation and avoid a tree by tree assessment approach when applications are proposed for individual development. Refer Figure 15 on the following page.

The proposed alternative Local Park has a similar area of 8400m² and an east-west depth of more than 160 metres, ensuring that enjoyment of the open space can occur at a suitable distance from Clyde Fiveways Road.



Figure 16: Alternative location for Local Park CF_LP_03 shown in light green in right image

The alternative Local Park provides an attractive setting with an existing treed canopy, and as the high point in the precinct has views to the east and south. On a clear day it is possible to see as far as the Baw Baw Range and Westernport Bay. As a high point, it is likely to have cultural heritage values. Further, its location opposite the Clyde South residential area may also encourage its use outside business hours, as well as provision of surveillance from the Clyde-Fiveways Road. The local park is approximately 500 metres from CF_LP-02 providing for appropriate distribution of open space.



Figure 17: Proposed Local Park looking eastward

17/2/22

The alternative location for Local Park CF_LP_03 accords with the following objectives of the PSP, more so than the proposed Linear Park, in that it will:

- *Objective 5 Deliver an integrated network of waterways and open spaces that tell the story of country..... provide amenity, and facilitate wildlife movement.*
- *012 To retain and protect features of the natural environment that make an important contribution to local character, amenity, heritage, culture and ecology.*
- *014 To contribute to the protection and integration of areas of cultural heritage and living cultural values throughout the precinct.*
- *018 To provide a range of open space and recreation opportunities that meet the needs to the community.*
- *019 To ensure that layout and design of open spaces and the public realm is safe, functional and inviting.*
- *020 To ensure the layout of lots, streets, open spaces, and the public realm encourage the retention and establishment of canopy tree cover.*

- G20
 - a. supports the legibility of the urban structure
 - b. retains and protects landscape features and existing vegetation that make a significant positive contribution to place character, amenity, cultural and/or ecological values
 - c. retains and protects Aboriginal cultural values and culturally significant places that are identified through the Cultural Heritage Management Plan (CHMP) process in consultation with the Bunurong Land Council Aboriginal Corporation (BLCAC)
 - d. incorporates the sense and experience of the natural environment into the planned urban character
 - e. provides for increased provision of tree canopy cover in the public realm over time.

The PSP process provides the opportunity to identify native vegetation necessary to be removed to accommodate appropriate development through the preparation of a Native Vegetation Precinct Plan under Clause 52.16. This can avoid unnecessary delays and streamline the approvals process especially for critical infrastructure. It is requested that a NVPP be incorporated into the PSP process.

Galileo has proactively suggested the retention and enhancement of native vegetation within a dedicated Local Park as outlined above, and subsequently we request the removal of other vegetation within the land holding be permitted. The removal of the vegetation will enable construction of the northern Employment Avenue ICP intersection and reasonable development of adjacent employment land.

We propose Plan 13 Native Vegetation Retention and Removal be amended to show the following vegetation to be permitted for removal, noting that vegetation adjacent to Clyde-Fiveways Road is proposed to be retained. Further information will be provided addressing the proposed tree removal.



Figure 18: Alternative Plan 13 Native Vegetation Retention and Removal to be amended with native vegetation permitted to be removed as shown in red.

Separately, we note that G20c. specifies that cultural heritage identified through the CHMP process must be protected. It is common for a CHMP to have a range of recommendations including salvage or limited salvage. It is requested that wording of be amended to 'Manage' cultural heritage values to accord with the specific BLCAC recommendations in any CHMP.

E. Requested amendments to the PSP – High Quality Public Realm

We seek amendment of the PSP as follows:

1. Amend PSP plan set including Plan 10 to show Local Park CF_LP_03 as per Figure 16.
2. Amend Plan 13 Native Vegetation Retention and Removal as indicated in Figure 18
3. Amend G20c to refer to *'Manage' Aboriginal cultural values....*

Conclusion

We anticipate ongoing discussions with the VPA and Melbourne Water regarding our alternative drainage scheme once further technical details are available. We look forward to achieving practical outcomes for the delivery of the Casey Fields South Employment precinct.

If you have any queries regarding the above, please contact the undersigned on [REDACTED] or via email at [REDACTED]

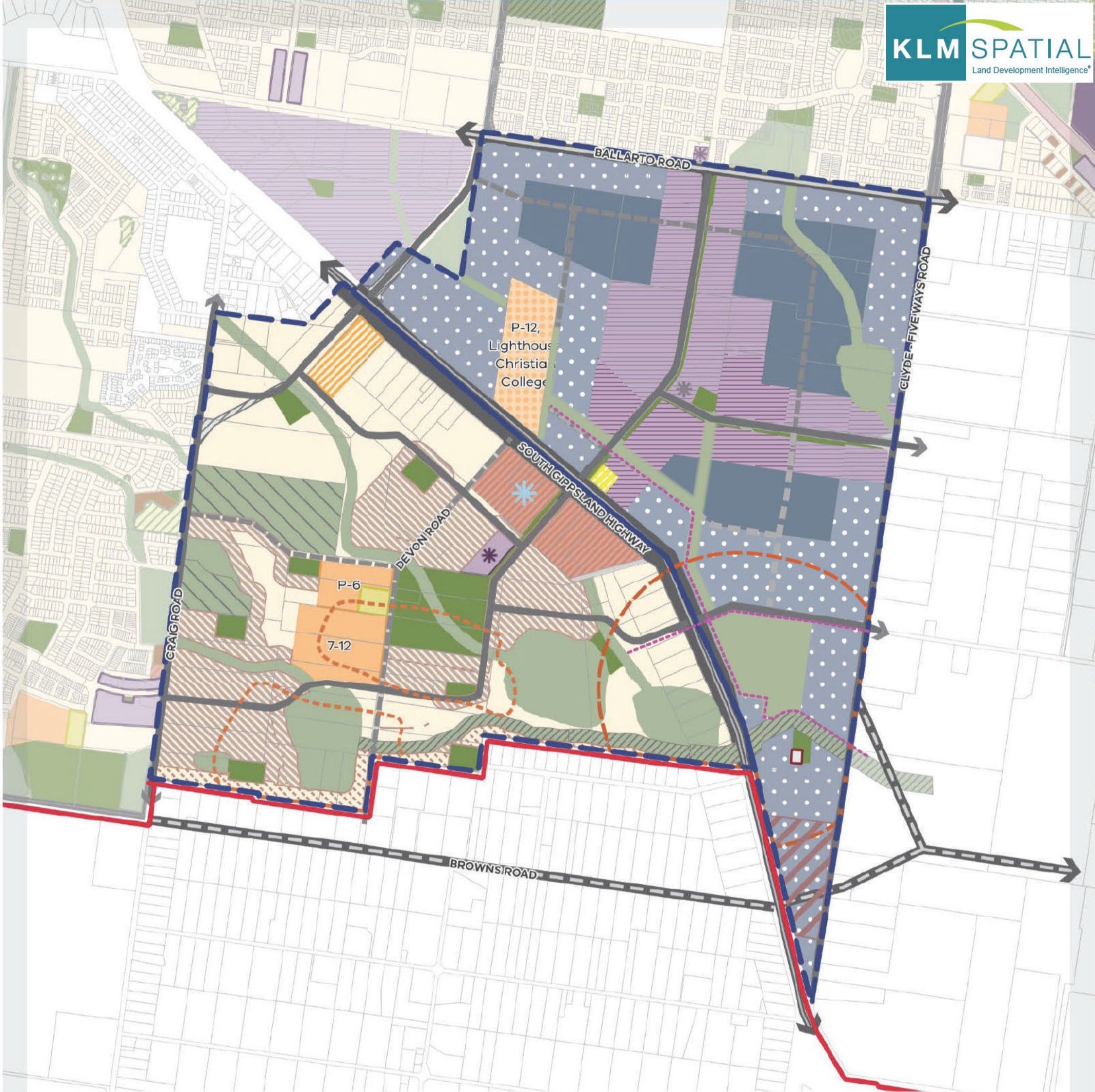
Yours sincerely,

[REDACTED]

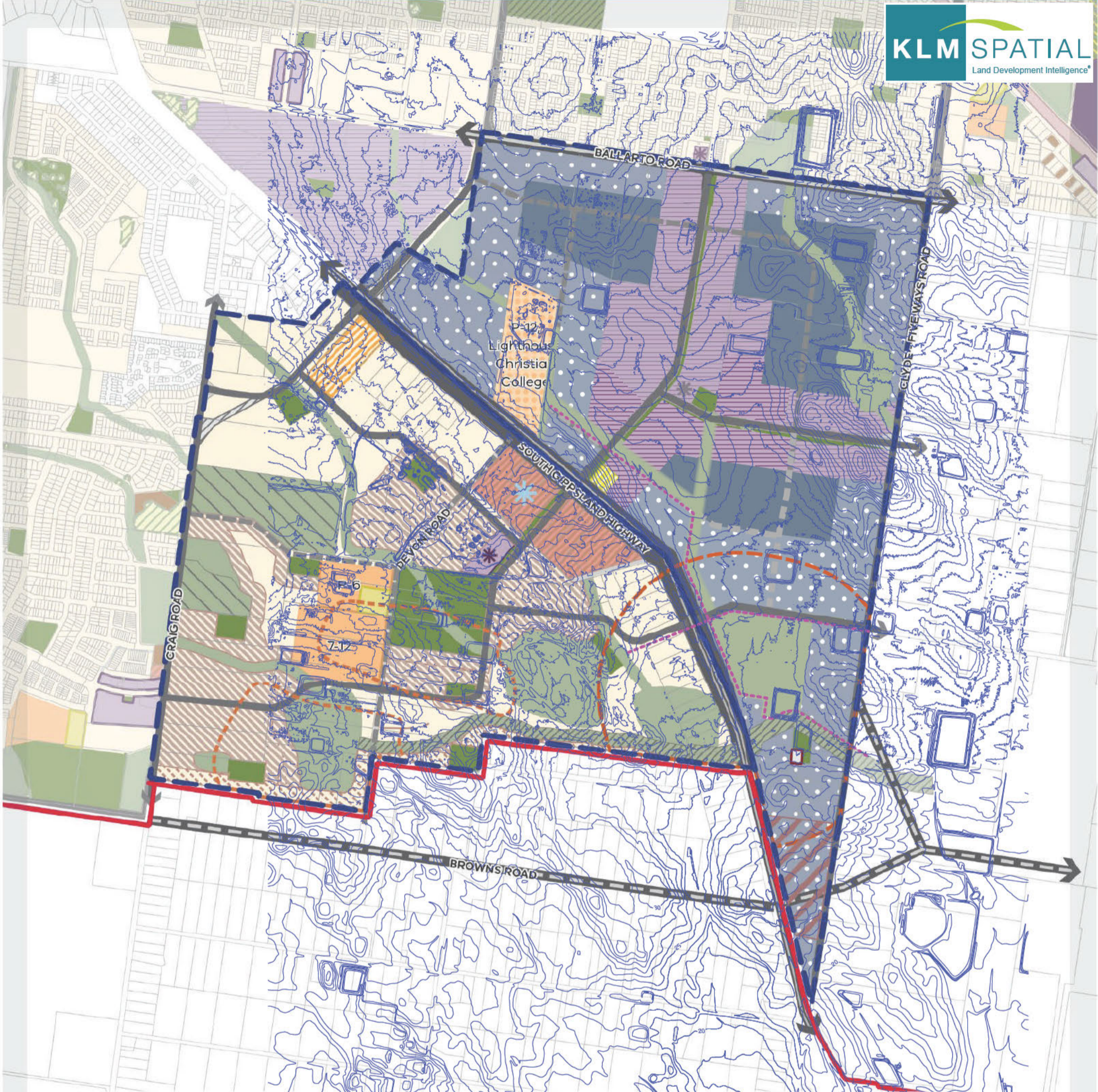
[REDACTED]
KLM Spatial

APPENDIX 1

1. After Plan 2 – Place Based Plan - as amended by KLM Spatial
2. After Plan 2 – Place Based Plan with contours - as amended by KLM Spatial



- | | | |
|---------------------------------|--|-----------------------------------|
| precinct boundary | existing non-government school | health facility (indicative) |
| parcel boundary | emergency services facility | business service hub |
| urban growth boundary | utility facility | glass factory separation distance |
| mixed business and industry | local community facilities | egg farm separation distance |
| industry | credited open space | investigation area |
| light industry | other uncredited open space | arterial road (6 lane) |
| residential | Public Acquisition Overlay (transport) | arterial road (4 lane) |
| mixed use | proposed PAO (drainage) | arterial road - indicative |
| local convenience centre | existing Public Acquisition Overlay (drainage) | connector street |
| proposed government school | area of increased density | local access street |
| potential non-government school | area of decreased density | shared path opportunities |



- | | | |
|---------------------------------|--|-----------------------------------|
| precinct boundary | existing non-government school | health facility (indicative) |
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| mixed use | proposed PAO (drainage) | arterial road - indicative |
| local convenience centre | existing Public Acquisition Overlay (drainage) | connector street |
| proposed government school | area of increased density | local access street |
| potential non-government school | area of decreased density | shared path opportunities |
| | | 1m contour interval |