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Mat Garner
Director, SE Metro Melbourne
Victorian Planning Authority
Delivered via email to cfsdm@vpa.vic.gov.au

Dear Mat

Submission - Casey Fields South (Employment) and Devon Meadows PSP

This is a submission from ID_Land to the Victorian Planning Authority (VPA) regarding:

- The exhibition of draft Amendment C295case to the Casey Planning Scheme which implements the Casey Fields South and Devon Meadows Precinct Structure Plan (the Draft PSP).
- The Casey Fields South (Employment) and Devon Meadows PSP Drainage Strategy accompanying the Draft PSP (the Draft Drainage Strategy).

ID_Land's interest in the Amendment is based on our purchase of 59 hectares of land within the Clyde South PSP in late 2021. The ID_Land holdings include 200 and 230 Moores Road and 185 Manks Road, Clyde. A location plan showing the location of our interests is included as Figure 1.

ID_Land requests changes to the Amendment and changes to the Drainage Strategy. The changes requested in this submission can be summarised as:

- **Submission 1. Ensure the PSP does not prejudice design options for the future Clyde South PSP road network.**
- **Submission 2. The Drainage Strategy should adopt SSP2 4.5 Middle of the Road Climate Change Scenario.**

Each submission is outlined in more detail below.

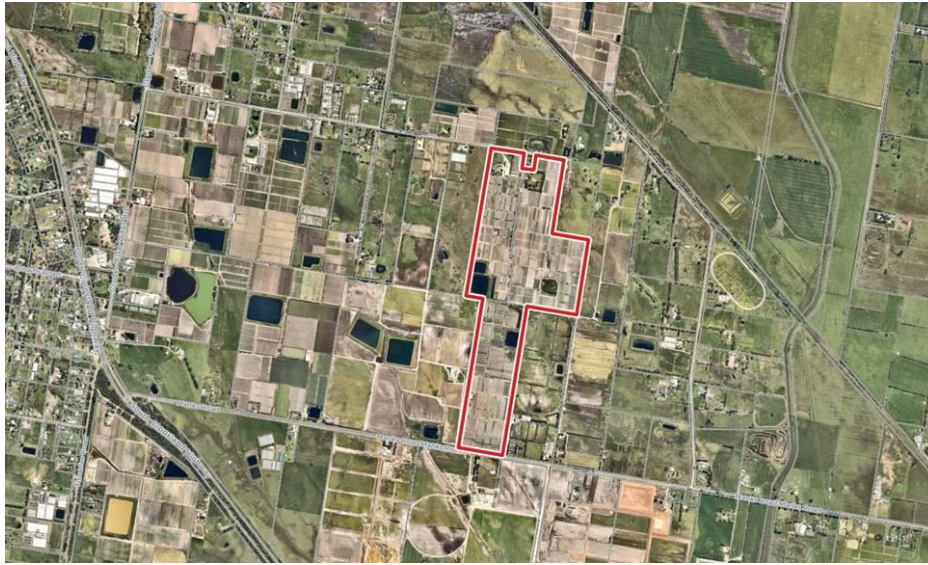
Submission 1. Ensure the PSP does not prejudice design options for the future Clyde South PSP road network

As indicated in Figure 2 and Figure 3, the exhibited PSP shows:

- Moores Road as a connector street east of Clyde Road.
- An east-west secondary arterial road in the future Clyde South PSP connecting to Browns Road at the South Gippsland Highway.



Figure 1: ID_Land Ownership within the Future Clyde South PSP



- Clyde Road deviating from its existing alignment east into the future Clyde South PSP on an angle to a T-intersection with the east-west secondary arterial road.
- An investigation area in the southern triangle generally south of the east-west arterial alignment between the South Gippsland Highway and Clyde Road.

The PSP includes the following transport related requirements:

“R2 All roads, must be designed and constructed generally in accordance with Plan 4 - Movement Network Plan, and relevant cross sections in Appendix 6 Standard road cross sections & functional layout plans, unless otherwise agreed by the relevant authority.”

Figure 2: Arterial Investigation Area





And:

“R4 Prior to the potential realignment of the Clyde Five Ways Road shown on Plan 4 Movement network, any subdivision and development requiring access from Clyde Five Ways Road must use the existing road reserve, unless otherwise agreed by the relevant authority.”

The location and detailed associated with In-09 and IN-10 in PSP Plan 10 and in the Precinct Infrastructure Table are shown in Figure 3 and 4 below.

Figure 3: PSP Plan 10 - Precinct Infrastructure Plan



Figure 4: Precinct Infrastructure Table

CATEGORY	PIP REF. NO.	TITLE	DESCRIPTION	LEAD AGENCY	COMPONENT INCLUDED IN ICP			TIMING	APPORTIONMENT FUNDING SOURCE	APPORTIONMENT TO THE ICP
					ULTIMATE LAND	INTERIM CONSTRUCTION	ULTIMATE CONSTRUCTION			
Intersection	CFS-IN-09	Intersection: Clyde Five Ways Road / Moores Road Extension	Provision of ultimate land and construction of an interim primary arterial to connector signalised 4-way intersection	Casey Council	Yes	Yes	No	S-M	Clyde South	50.00%
Intersection	CFS-IN-10	Intersection: South Gippsland Highway / Clyde-Five Ways Road / Browns Road	Provision of ultimate land and construction of a primary arterial to secondary signalised 4-way intersection	Casey Council	Yes	Yes	No	M-L	Clyde South	50.00%

The PSP is accompanied by two Jacobs technical reports. These reports were prepared during the technical analysis phase and show an arterial road network through the Clyde South PSP that is materially different to what is shown in the



exhibited amendment. The exhibited PSP road network is therefore not supported by technical analysis.

ID_Land is concerned that the PSP is locking in and locking out certain road network options for the Clyde South PSP without properly assessing the impact of that decision.

Figure 5: Jacobs Proposed Transport Network

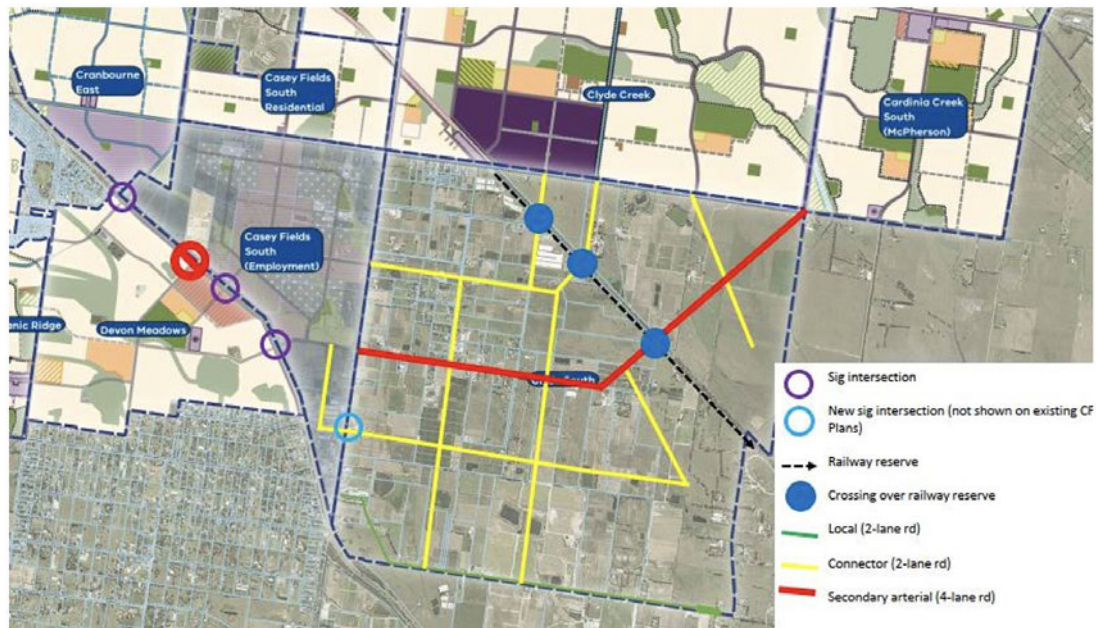


Figure 4-2: Proposed transport network for Clyde South PSP (Source: VPA)

Section 7.8 of the Jacobs analysis provides:

Although the strategic modelling indicated that Moores Road should be considered as a four-lane arterial, there may be capacity available in the connector street to the north, subject to detailed modelling. The daily vehicle volume along Moores Road, east and west of Clyde Five Ways Road is approximately 22,000 and 20,000 respectively in the 2051 project case. This raises concerns about potential future traffic congestion, particularly given the proximity of the Moores Road/South Gippsland Highway and Moores Road/Clyde Five Ways Road intersections.

Section 4.3 provides:

Note that Bells Road is a key link for the emerging PSPs, but it does not serve a wider role in the arterial network such as trips from Pakenham to the Western Port Highway. Berwick-Cranbourne Road / Clyde-Five Ways Road / Fisheries Road provides a better connect for such a route, however there is not significant demand for such as movement. Linking Bells Road with Browns Road does not appear to cater for any particular priority movement.

In summary, the key issues with the Draft PSP are:

- The PSP rules out Moores Road from forming a connection from Bells Road in the north to the South Gippsland Highway as a secondary arterial road.



This is the network used in the Jacobs analysis for the PSP and shown in Figure 5.

- The PSP introduces an uncertain secondary arterial alignment which has not been tested by the Jacobs analysis.
- The PSP connects the Bells Road extension to Browns Road via a new secondary arterial. It is unclear whether that alignment would increase traffic on Browns Road and what the implications for Browns Road might be.
- The PSP deviates Clyde Road east to connect to the new secondary arterial through the future Clyde South PSP. It is not apparent that alternative road alignment options were considered. For example, the Growth Corridor Plan in Figure 6 provides for Clyde Road to remain on its current alignment, before connecting to Browns Road.

Figure 6: Extract from Growth Corridor Plan



ID_Land submits that the VPA should as soon as possible:

- Explain the rationale for the adopted road network in terms of its implications for the Clyde South PSP. The PSP appears to have recently adopted the change without evidence that its implications have been adequately tested.
- Ask Jacobs to test several road network scenarios, including the PSP road alignment which deviates Clyde Road as shown in the PSP. That analysis should be made available to Council and interested landowners.

ID_Land submits that the PSP road network prejudices the road network option shown in the Jacobs Report in Figure 5 being achieved. It does that without strategic justification and without testing the outcome of the PSP adopted road network.



To avoid delaying the adoption of the PSP, ID_Land submits that the PSP should be amended so it does not apply to land south of the Moores Road extension to South Gippsland Highway. That part of the PSP should be excised and included in the Clyde South PSP.

If the VPA adopts this approach, it will allow for the Clyde South PSP to test and resolve the road networks issues. The relevant area to be excised from the Casey Fields Employment PSP is shown in Figure 7. It is important that the option of extending Moore Road as a secondary arterial to the South Gippsland Highway is not prejudiced should that prove to be the best approach.

Figure 7: Area to removed from CFS PSP and added to Clyde South PSP



Submission 2: DSS Climate Change Scenario

The GHD Drainage Strategy which informs the Clyde South PSP does not yet reflect a specific climate change scenario. The GHD Strategy includes sensitivity testing of several scenarios in Section 6 Appendix D.

The Strategy proposes to be revised to adopt a climate change scenario, see for example the following extract:

“5.1.2.4.3 Revised climate change guidance



During the delivery of the Devon Meadows and Casey Fields South concept drainage strategies, revised climate change guidance was published by Australian Rainfall and Runoff on August 27, 2024 (Wasko, C, Westra, S, Nathan, R, Jakob, D, Nielsen, C, Evans, J, Rodgers, S, Ho, M, Babister, M, Dowdy, A, and Sharples, W, 2024). A sensitivity analysis was conducted using this revised climate change guidance. This provides an indication of how the proposed concept design is performing with revised uplifts in rainfall intensity (and adjusted initial and continuing losses).

To allow comparison of existing development condition flows to flows under the proposed concept, the existing conditions hydrologic RORB models for Devon Meadows and Casey Fields South have been run for a Shared Socioeconomic Pathway (SSP) 5/RCP 8.5 with an uplift in rainfall intensities and adjusted losses. The results are shown in Section 5.1.3.”

It is understood that there are 5 Shared Socioeconomic Pathways as follows:

- *“SSP1: Sustainability – Taking the Green Road (low challenges to mitigation and adaptation)*
- *SSP2: Middle of the Road (medium challenges to mitigation and adaptation)*
- *SSP3: Regional Rivalry – A Rocky Road (high challenges to mitigation and adaptation)*
- *SSP4: Inequality – A Road divided (low challenges to mitigation, high challenges to adaptation)*
- *SSP5: Fossil-fuelled development – Taking the Highway (high challenges to mitigation, low challenges to adaptation).”*

With regard to climate change scenario testing SSP5, which is the worst-case scenario, section 8.10 of the GHD Report provides

8.10 Updated climate change guidance

During the delivery of the Devon Meadows and Casey Fields South concept drainage strategies revised climate change guidance was published by Australian Rainfall and Runoff on August 27, 2024 (Wasko, C, Westra, S, Nathan, R, Jakob, D, Nielsen, C, Evans, J, Rodgers, S, Ho, M, Babister, M, Dowdy, A, and Sharples, W, 2024).

This revised climate change guidance has been modelled to provide an indication of how the proposed concept design is performing with revised uplifts in rainfall intensity (and adjusted initial and continuing losses). The existing conditions and developed conditions hydrologic RORB models for Devon Meadows and Casey Fields South have been run for a Shared Socioeconomic Pathway (SSP) 8.5 with an uplift in rainfall intensities and adjusted losses. For this assessment the outlet configuration for all basins has not been altered from the concept design. The results from this analysis are shown in Table D.3 and Table D.6 in Appendix D.

The results show the following:

- For Devon Meadows the embankment heights have not been increased for this assessment. Peak water surface elevations have increased in each proposed basin, which has resulted in a decrease in available freeboard within each proposed asset, or removal of freeboard all together. The outflows from each asset are less than the pre-developed peak flow rates
- For Casey Fields South the embankment heights were increased for this assessment. This has resulted in freeboard being available. Peak water surface elevations have increased in each proposed basin except for CFS4. With the increase in embankment heights freeboard is available. No refinement of this embankment height has been undertaken. The outflows from each asset are less than the pre-developed peak flow rates

The following observations can be made from this assessment:

- The outlet configurations for each basin are performing relatively well but are over attenuating the increase in peak flood flows. If revised climate advice was to be adopted in the concept design, it would be worth considering the feasibility of having outlets sized for an SSP8.5 scenario with a temporary adjustable orifice plate for base climate conditions
- The overall increase in estimated peak flood flows will likely have an impact on conveyance of peak flows through the proposed development i.e. this will potentially impact the size of proposed new waterways

A summary of the recommendations for further work is provided below:

- It is recommended that revised climate change guidance (Wasko, C, Westra, S, Nathan, R, Jakob, D, Nielsen, C, Evans, J, Rodgers, S, Ho, M, Babister, M, Dowdy, A, and Sharples, W, 2024) is adopted in the next phase of design



In the conclusion of the Report in section 9.1, the Report recommends that “It is recommended that revised climate change guidance is adopted in the next phase of design”.

ID_Land submits that the next version of the GHD Drainage Report should adopt the following approach:

- It should not adopt SSP8, as it is the most conservative pathway and unlikely to be the long-term outcome and it assume full fossil fuel development and low adaptation and mitigation.
- It should undertake sensitivity testing of each SSP climate change scenario to clarify the impact on assets and the subdivisional drainage network / gaps flows in each.
- If there is a material difference and impact on assets sizing and costs, then the GHD Strategy should adopt Climate Change Scenario SSP2 – 4.5. This scenario is the most likely outcome and is “middle of the road”.

ID_Land’s interest in this matter relates to the precedent that will be set in this PSP that will influence the approach to be adopted in future PSPs, including in Clyde South.

Conclusion

ID_Land supports the finalisation of the PSP as soon as possible. The PSP is needed for critical land supply for the Casey Growth corridor.

ID_Land submits that further transport network planning work and testing is required. Until that work is complete, the design of the PSP south of Moores Road should be deferred and resolved as part of the Clyde South PSP preparation process.

The Clyde South PSP owners are committed to funding the Clyde South PSP and would like the VPA to commence that work immediately. Early completion of the Clyde South PSP can comprehensively address the wider road network issues, include consultation with the City of Casey and get to the optimal solution. In the meantime, it is important that the PSP does not prejudice road network options for the Clyde South PSP.

ID_Land also wishes to ensure that the climate change scenarios adopted for the Drainage Strategy are reasonable and not overly conservative.

Yours sincerely,

[Redacted signature]

[Redacted name]

[Redacted title]

ID_Land