



31 March 2025

Victorian Planning Authority
1 Spring St
Melbourne VIC 3000

Via email: cfsdm@vpa.vic.gov.au

To whom it may concern,

**Dennis Family Corporation
Submission to Draft Casey Fields South (Employment) & Devon Meadows PSP
Amendment C295case to the Casey Planning Scheme**

Dennis Family Corporation (DFC) is recognised as one of Australia's leading privately owned residential land developers, managing master planned communities in both Victoria and South-East Queensland. We have significant experience building successful greenfield communities throughout the greater Melbourne area, as well as several interests in regional Victorian areas.

DFC owns land in the neighbouring Clyde South PSP precinct area and is thus interested in the draft amendment documents and any potential implications for the future Clyde South Precinct Structure Plan (PSP).

Introduction

We congratulate the VPA on the Exhibition of Amendment C295case and the work done to date by the VPA, Melbourne Water and Casey Council.

The following letter sets out submissions by DFC in response to proposed Amendment C295 to the Casey Planning Scheme – the Casey Fields South (Employment) & Devon Meadows (CFS&DM) PSP.

1. Drainage Strategy Impacts upon the Clyde South PSP area

The Background Report accompanying the amendment documents notes that the Drainage Services Schemes proposed in the CFS&DM PSP are unresolved at the time of public consultation (p. 21).

From our reading, the proposed drainage strategy for the PSPs relies upon the future Clyde South PSP precinct area to manage stormwater flows from the southern half of the CFS&DM PSP specifically within the proposed Clyde Five Ways Road Drainage Services Scheme (DSS).

This DSS requires the construction of a new diversion waterway along the southern boundary of the Devon Meadows area, utilising land not presently encumbered by existing drainage lines:

*To facilitate delivery of the DSS, a PAO in favour of Melbourne Water is proposed to enable delivery of a new constructed waterway along the southern boundary of Devon Meadows precinct which is necessary to provide essential drainage outfall. The proposed waterway extends from RB-04 to the west of Devon Road, along the southern boundary of the precinct and crossing under the South Gippsland Highway to pass through lower tip of Casey Fields South before terminating in the future Clyde South precinct to the east. The proposed PAO applies to the full extent of waterway.
(VPA Background report, p.21)*

The draft PAO – Schedule 4 (PAO4) shows that the proposed diversion waterway extends significantly east beyond the Clyde Fiveways Road and onto land within the Clyde South PSP precinct area (See Figure 1, below).

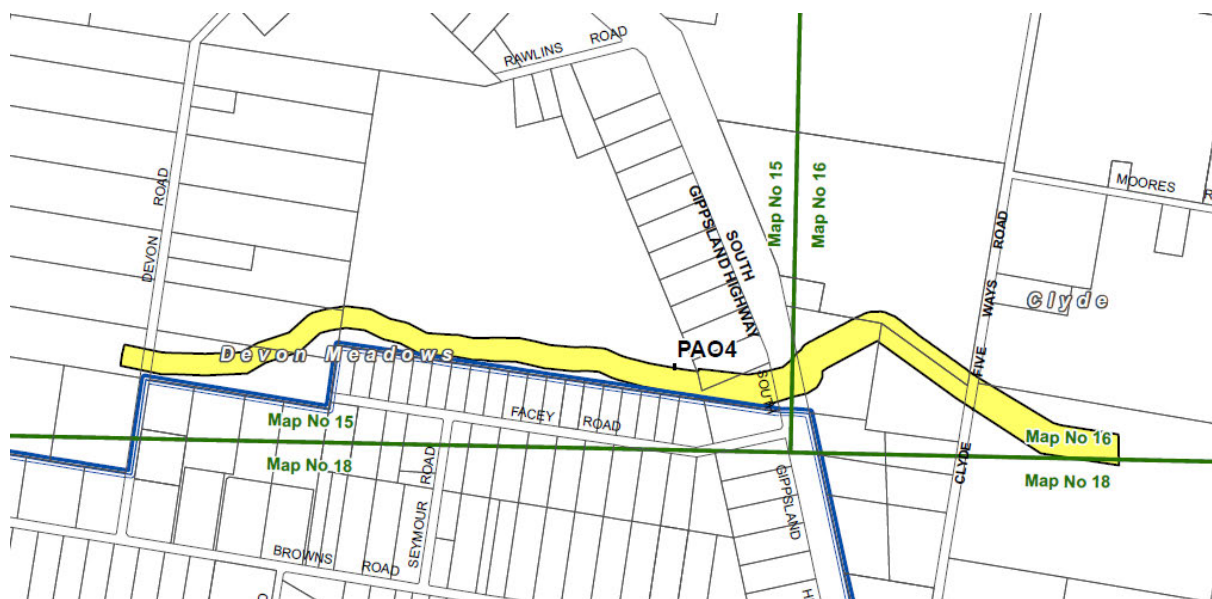


Figure 1 - Casey Amendment C295case – Public Acquisition Overlay – Schedule 4 (VPA)

In fact, the PAO4 extends well beyond the waterway shown in the GHD concept drainage strategy plan upon which the drainage services scheme is based (See Figure 2, below).

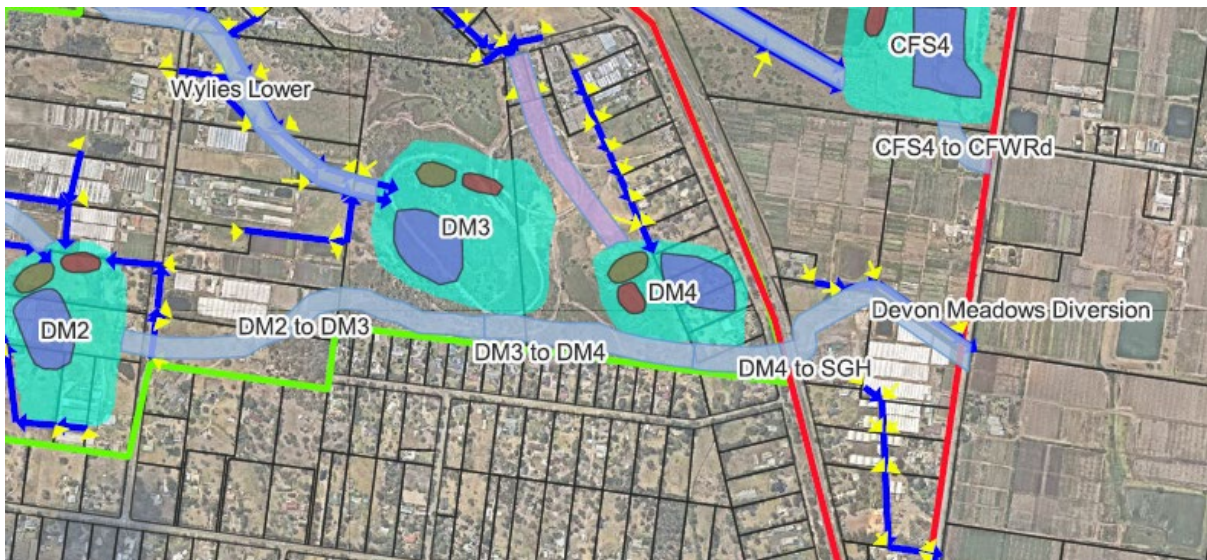


Figure 2 - Appendix C – Preliminary concept drainage strategy plan - Figure C1 (Source: GHD Interim report – Casey Fields South (Employment) and Devon Meadows Precinct Structure Plan – Preliminary Concept Drainage Strategy, 21 February 2025).

The diversion waterway thus moves stormwater flows from the south of the Devon Meadows PSP and into the Clyde South PSP precinct. The amendment documents are largely silent on how these flows are proposed to be conveyed and attenuated beyond the end of the PAO4 extent, however it seems clear that a retarding basin will need to be constructed somewhere near the southern boundary of the Clyde South PSP along Manks Road, prior to water discharging into the Westernport Green Wedge.

The GHD report also suggests the potential need for additional land take within the future Clyde South PSP area to manage cumulative flood peaks within the proposed Clyde Five Ways Road Drainage Services Scheme (DSS). This scenario arises from the merging of two outfalls (O1 and O2) from the CFS&DM PSP east of the Clyde Fiveways Road, within the Clyde South precinct:

*The development of preliminary concept drainage strategies for the Devon Meadows and Casey Fields South PSP catchment areas has been completed using two separate hydrologic models for each PSP respectively, to allow for application of Areal Reduction Factors applicable to the individual PSP areas. This assessment does not include the proposed developed conditions for both PSP areas in a single model. **There is a risk that where flows converge at confluences downstream in more widespread events there may be cumulative impacts on flood peaks if proposed retarding basins have their peak flood flows occurring within similar time periods. To allow for more comprehensive assessment of the impact of diverting flows from Devon Meadows into Casey Fields South, it is recommended that future design phases adopt a combined/single model of both PSP areas (to Manks Road).***
(GHD, p.53, emphasis added)

The reliance upon land within the Clyde South PSP to ameliorate stormwater flows from the CFS&DM PSP is concerning in the absence of a further information detailing how stormwater will be managed within the PSP. While Melbourne Water has agreed to fund additional works within the Clyde South precinct, including land acquisition associated with the PAO4, there remains a dearth of other information relating to implementation of the proposed drainage scheme. For example, it is unclear how the Clyde Five Ways Road Drainage Services Scheme (DSS) is going to operate to best practice standards in the interim, that is, until resolution of the above issues within the Clyde South PSP area.

For landholders in the Clyde South PSP precinct this also creates uncertainty regarding external impacts on land within the precinct, the timing of these drainage works, funding for additional / enlarged DSS assets and any reductions to net developable area (NDA).

Submission 1: We request clarification of the full impacts of the proposed Clyde Five Ways Road Drainage Services Scheme (DSS) upon the Clyde South PSP.

These concerns are further compounded when read in parallel with Section 3.7 of the PSP and the Infrastructure and Development Staging Plan (Plan 9, p.47).

2. Operation of the proposed Infrastructure and Development Staging Plan

The proposed infrastructure and development staging approach adopted in the PSP is based on the regulation of development in stages according to provision of specific, enabling drainage infrastructure.

Four stages are identified in Plan 9 of the PSP and follow a general sequence moving from the south (S1a) and east (S1b) to the north-west (Stages S2a and S2b) of the precinct. Requirement R19 of the PSP states that staging of infrastructure and development must be in general accordance with that sequence, further reinforced by Requirement R27 which calls out the specific infrastructure assets to be delivered prior to issue of a statement of compliance for any stage. Those key infrastructure items, listed in Table 8 and shown in Plan 9, must be delivered only in their ultimate form, in accordance with Requirement R28.

We are concerned that the catch-all approach taken to provision of those items of infrastructure identified in Table 8 and Plan 9 conflates drainage infrastructure across two separate and independent DSS', namely the Clyde Five Ways Road DSS and the Moores Road DSS. Project items O2 and O3 are identified in Stage S1b but outfall into the separate schemes (See Figure 3).

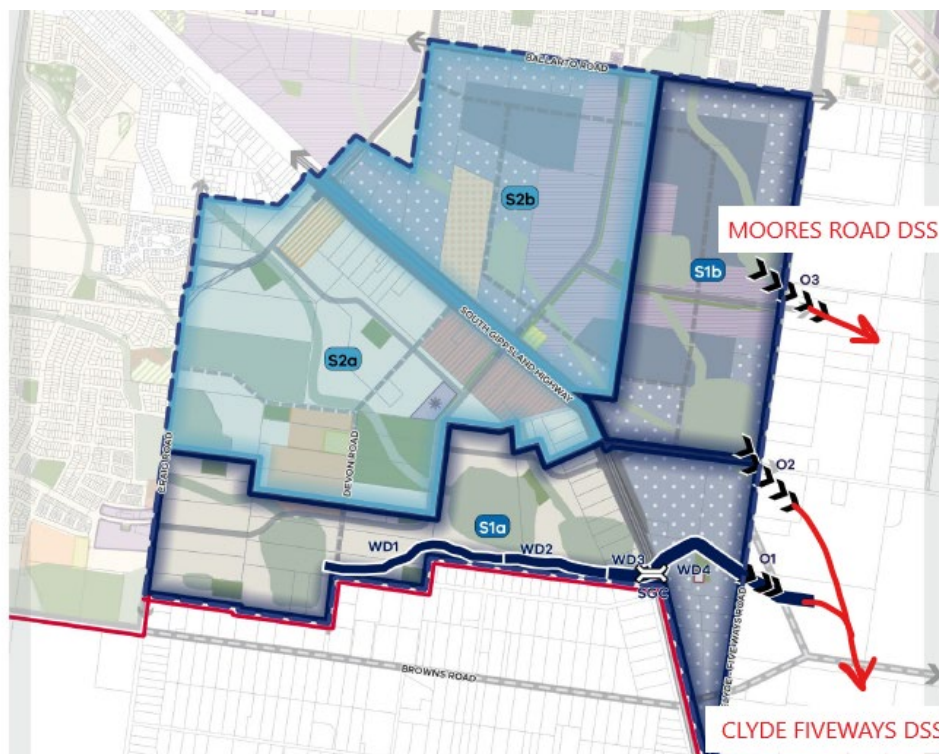


Figure 3 – PSP Plan 9 Infrastructure and Development Staging (VPA) – highlights added

This will effectively mean that land within the Moores Road DSS in Stage S1b will not be able to develop until all infrastructure items identified in Table 8 are delivered. However, this land only requires construction of outfall O3 (and other upstream drainage infrastructure in the Moores Road DSS) to develop. This highlights difficulties in imposing such an inflexible staging regime over the PSP.

While we acknowledge the importance of ensuring the timely delivery of key enabling drainage infrastructure identified in Plan 9, we fear that the imposition of such a universal and inflexible sequencing of stages and infrastructure projects, particularly given the land fragmentation of the PSP, may inadvertently stall all development in the PSP.

This problem may be further exacerbated if there is inadequately developed downstream infrastructure in the Clyde South precinct, preventing the satisfactory delivery of the Clyde Five Ways Road DSS, and by extension, potentially the Moores Road DSS.

Conversely, if enabling drainage infrastructure within the CFS&DM PSP is significantly delayed, it may have the potential to delay development of the Clyde South PSP in the future.

Submission 2: We request greater flexibility be written into the infrastructure and development staging requirements in Section 7.3 of the CFS&DM PSP. Requirements should be revised to permit some flexibility in the order of delivery of the identified staging infrastructure where it can be demonstrated that an alternative deployment of key infrastructure can meet DSS outcomes, to the satisfaction of the relevant water authority.

DFC appreciates the opportunity to make a submission to Casey Amendment C265case. We look forward to discussing the submission further with the VPA at your earliest convenience.

Should there be further questions in relation to any of the matters made within this submission, please do not hesitate to contact [REDACTED] Structure Planning Manager via [REDACTED]

Yours sincerely,

[REDACTED]

[REDACTED]

Manager – Planning