



19 March 2026

██████████
Strategic Planning Manager
Department of Transport and Planning

Dear ██████████

Submission to Draft Amendment C306case to the Casey Planning Scheme - Cardinia Creek South Part 2 Precinct Structure Plan

Urbis acts on behalf of ██████████ as the landowner of ██████████ ██████████ Clyde North (the subject site) within the Draft Cardinia Creek South Precinct Structure Plan (the PSP) and Infrastructure Contributions Plan (the ICP) area. We understand this Amendment seeks to amend the PSP by including the Part 2 area into the Casey Planning Scheme. The subject site is impacted by the PSP.

We thank DTP for working collaboratively with us during the preparation of the Amendment and providing direction as needed. We have purposefully kept our submission points to a minimum and note that, in the whole, we are supportive of the amendment and do not see the need to list all the matters that are supported. We have confined our submission to the key matters which are either:

Matters already raised and understand there is agreement that they can be updated/resolved.

Key matters which we see require some further consideration before adopting the final PSP and ICP.

1 Background

██████████ is the owner of the subject site at ██████████ which will be developed as an extension to the Smiths Lane estate to the north.

██████████ remains committed to assisting in expeditious integration of the PSP and ICP into the Casey Planning Scheme. It is intended to follow the gazettal of the Part 2 PSP with an immediate application to subdivide ██████████ ██████████ and continue providing much-needed residential options in the popular Clyde North growth area.

The approach of modifying the existing Part 1 PSP effectively reflects the original vision for Cardinia Creek South prior to the hiatus imposed on Part 2 during the investigation of sites for the Clyde Regional Park. ██████████ continues to support the strategic intent of the revised combined PSP and remains committed to supporting the VPA and partners in delivering the broader vision for Cardinia Creek South.

2 Submission

The matters outlined below form our submission.

2.1 Future Delivery of McCormacks Road

The amended draft PSP introduces a new Infrastructure Contributions Plan (ICP) funded project, RD-08:

McCormacks Road from Part 2 precinct boundary to North-South Connector Road: Construction of a 2-lane connector carriageway to upgrade road reserve from 20m to 25m (ultimate treatment).

An indicative cross-section (13) is provided on Page 82 of the draft PSP.

Overview

██████ accepts there is a requirement for the future upgrade of McCormacks Road to connector status. The development thresholds to trigger upgrading outlined in the Cardinia Creek South (Part 2) PSP Transport Network Assessment (Stantec, February 2026) appear broadly reasonable.

Furthermore, ██████ accepts that the approximately 5m of land from ██████ is required to create a suitable road reserve and to reduce impacts on the southern land, outside the Urban Growth Boundary. Construction of the connector to the North-South Connector Road which ██████ is logical.

It is our submission that the RD-08 ICP project ought to extend beyond the boundary of the Part 2 PSP to the west where Pound Road, Pattersons Road and Muddy Gates Lane converge with the current unsealed entrance to McCormacks Road. Three properties, all in the Part 1 PSP (55 & 75 McCormacks Road and 1715 Pound Road) have frontages to McCormacks Road in this section.

We understand that Casey City Council has engaged with these landowners to highlight the requirement for the upgrading of McCormacks Road and the need to set aside the necessary land within the private landholding (approx. 5m) to deliver the Connector Road.

We support the inclusion of RD-08 project as an ICP item as it constitutes effective strategic planning but recommend that RD-08 project extend to the west to provide the important connection to the broader catchment.

Delivery of McCormacks Road

It is ██████ view that the standard levy for transport payable under the ICP can and should be utilised to deliver RD-08 extension. The Part 2 PSP area benefits from existing roading networks from the north and west that are either in place or will be delivered through future development in the Part 1 PSP, funded by the standard transport levies collected in the Part 1 PSP. The only significant transport project required to service Part 2 PSP is the upgrading of McCormacks Road. If that upgrading occurs alongside three Part 1 PSP properties – and potentially provides benefits for those properties – it is no different to the benefits gained by the Part 2 PSP from the road network delivered by Part 1 landowners.

Our position is that there is strategic basis for construction of McCormacks Road to be funded via the ICP for the Part 2 PSP to facilitate its delivery across a number of titles along the edge of the UGB and; that this is allowable under the Ministerial Direction for ICPs.

Our Memo dated 29 January 2026 provided to DTP sets out the rationale and benefits of its inclusion in the ICP. Our submission is that an amendment to Plan 1 (Transport Projects) of the PSP should occur to extend ICP Project RD-08 to the west to connect to Muddy Gates Lane intersection. This will:

- Elevate the status of the McCormacks Road project and provides Council with a clear basis on which to require its delivery.
- Provide a clear mechanism for delivery of the full extent of McCormacks Road without affecting the ICP currently in operation for the Part 1 PSP. Under this approach, developers within the Part 1 PSP would not be required to contribute additional funding beyond the existing arrangements. Importantly, this does not disadvantage the two landowners within CCS Part 2, as the standard levy would continue to apply.
- Assist in the delivery of the road for properties to the west as it removes any obligation to construct a one sided connector street. We expect this outcome would be supported by the adjoining landowners and co-operation to enable access to land for delivery more likely.
- Allow [REDACTED] to enter into a 173 Agreement with the Council to deliver the road as WIK against the ICP levies.
- Not disadvantage [REDACTED] or Jetwise as McCormacks Road can be delivered well within the standard levy for transport items.

It is our submission that the inclusion of the entire length of McCormacks is allowed pursuant to the Ministerial Direction for ICPs noting:

- A connector road is an allowable supplementary item under the ICP framework, and no supplementary levy is proposed. The approach appropriately utilises the flexibility provided within the ICP Framework, noting that the Ministerial Direction at Clause 13(c) expressly allows for works, services or facilities that are listed as supplementary levy items to be funded within the total standard levy rate so long as there are sufficient levies to fund all the standard items. This is the case for Part 2 PSP.
- Table 5 in the Ministerial Direction lists the supplementary items which can be funded either via a Supplementary Levy or within the Standard rate as provided for in 13(c) noted above. Table 5 includes requirements sitting alongside the listed allowable items which all relate to the inclusion of a Supplementary Levy. This is not the case for the Part 2 PSP/ICP.

We understand that DTP have been considering how the extension of RD-08 beyond the PSP boundary would respond to Table 5 of the ICP Direction. In our view, the requirements listed in Table 5 relating to Connector Roads do not apply given that a supplementary levy is not proposed to be applied. Specifically a requirement for connector roads in Table 5 states that "The estimated cost of the item must be fairly levied amongst the developers who will benefit from the delivery of the item". This relates only to where a Supplementary Levy is proposed given these projects are specially costed under the ICP with those additional costs then needing to be fairly levied for that item across the ICP land. In the case of CCS ICP, only the standard levy will apply and as such there are no additional levies incurred by the landowners in Part 2 when the full length of the McCormacks Road transport project RD08 is included.

Nevertheless, fairness would prevail even if the above condition was applicable – standard levies benefit from pre-determined fairness, as all PSP landowners have to pay at the same rate. In the same manner Part 1 PSP

landowners have paid for linkages that enable Part 2 PSP to be accessible; Part 2 PSP will contribute its standard levies to complete the PSP’s overall strategic road network

Given the above, we do not see any impediment to the inclusion of the full length of McCormacks Road being included as an ICP item and believe it will be of significant benefit to the Part 2 PSP area. We appreciate DTP taking a pragmatic and policy driven view on this matter to date and ask that you consider our submission in this regard. Figure 1 below shows how the funding of the entire upgrade of McCormacks via an extended RD-08 meets the requirements of the Direction:

Applying the Ministerial Direction on Preparation and Content for ICPs

How Standard Levy can pay for McCormacks Road Upgrade – Muddy Gates Lane to N-S Connector at 95 McCormacks

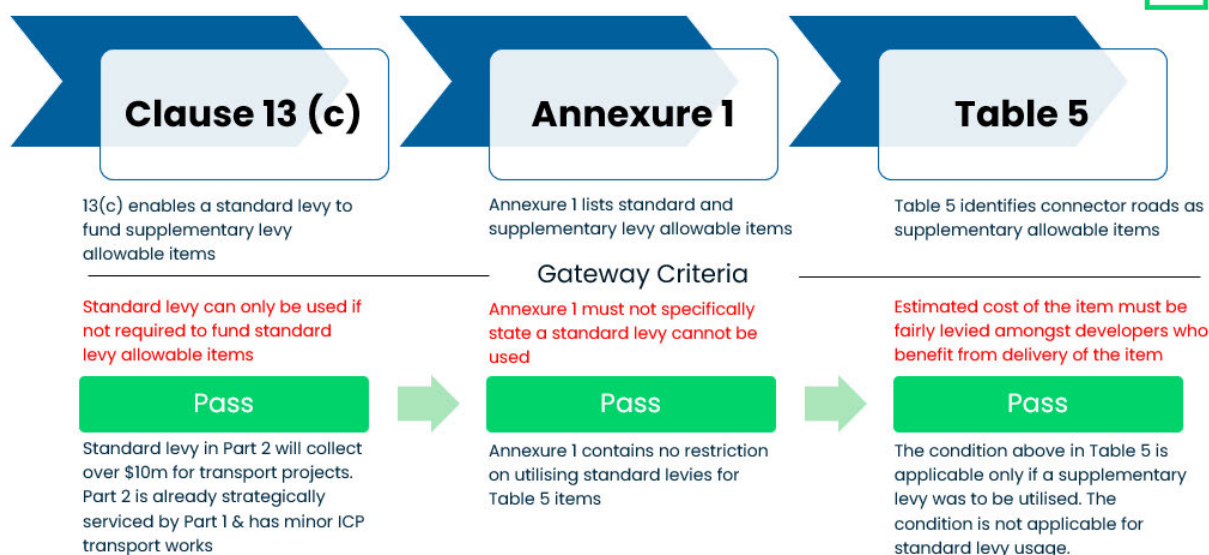


Figure 1: Application of Ministerial Direction to using standard transport levy to fund McCormack Road upgrade

Conclusion

It is [redacted] request that the VPA modify RD-08 to extend from the Pound Road intersection to the North-South Connector Road at 95 McCormacks Road, with the intent that the Part 2 PSP ICP funds this project through the standard transport levy.

It is recognised that engagement has occurred with the three relevant landowners regarding future developer works, and the need for McCormacks Road to eventually achieve connector road status has long been enshrined in the Future Urban Structure in the Part 1 PSP. At that time it lacked a delivery mechanism, which the Part 2 PSP now provides – a clearly progressive step that would seem akin to what originally intended by the PSP masterplanning process prior to the dividing of the PSP.

2.2 Timing of RD-08

Section 4.1 (Precinct Infrastructure Plan) identifies project RD-08 as having Medium to Long timing. Whilst no guidance is provided as to the specific timeframes, the typical timing in PSPs is based on Short being 0-5 years; Medium being 5-10 years; and Long being 10 years+, and that is assumed in this instance.

██████ intends to commence development immediately post-gazettal. Whilst development will be staged and naturally subject to market conditions and infrastructure delivery, it is unlikely that the latter stages (those bounding McCormacks Road) will be being developed 10 years+. Should the adjoining landowner also commence development in a Short to Medium timeframe, it is possible the capacity threshold for traffic may be met and become the driving force for requiring the upgrade. Consequently, ██████ considers RD-08 should be considered a Medium term project to ensure all delivery partners understand the relative degree of urgency.

2.3 Sewer Network

██████ notes the sewer network indicated on Plan 10 of the draft amended PSP does not reflect current conditions, with a branch sewer already constructed along McCormacks Road and Australis Drive (the 'North-South Connector'). Please refer to Appendix A for an updated servicing plan.

2.4 Drainage

Plan 9 of the draft amended PSP includes a proposed drainage asset in the south-eastern corner of 95 McCormacks Road. This location of this asset is based on Melbourne Water's Development Scheme Services plan, annotated as Sediment Basin 10 (SB-10). Following engagement with Melbourne Water, additional assessment indicated a more efficient treatment asset would be a Gross Pollutant Trap (GPT) within the road reserve and as such means SB-10 is not required. Regardless of the asset type, given the catchment size is under 60 hectares, the asset will become the responsibility of the relevant council - Casey City Council subsequently confirmed a GPT would be a preferable outcome.

In February 2026, Melbourne Water advised that the owner of 80 McCormacks (land to the south of the PSP) had written to Melbourne Water stating that they did not want the option of a diversion to receive flows from the upstream catchment. As a result, Melbourne Water requested that ██████ amend their SWMS for 95 McCormacks Road to remove the diversion. Given the role of the GPT was only to provide pre-treatment prior to the diversion of flows to supply 80 McCormacks Road, the GPT asset is also no longer required and has been removed.

Given the above, the asset is no longer required and should be removed from the relevant PSP plans and associated land budget.

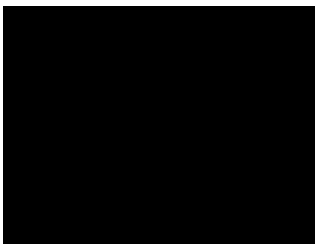


Figure 1 - Drainage asset as shown in Plan 9 of the PSP, previously agreed with VPA to be removed

3 Conclusion

We trust that this submission is helpful to the VPA as it works towards finalising the PSP and associated documents. We look forward to meeting with you to resolve the limited matters raised.

Kind regards,



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