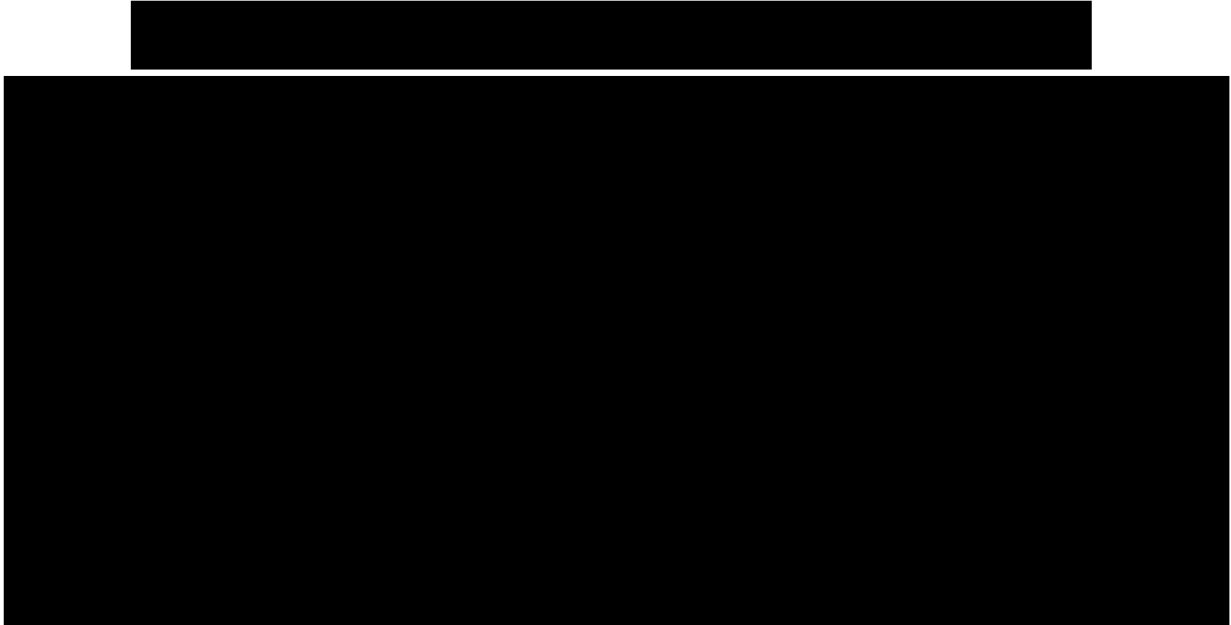


Response to the Exhibition of Amendment C265 Concerning:



Ref: 5787

Prepared by

Perry Town Planning

November 2020

1 INTRODUCTION

Perry Town Planning acts for [REDACTED] which owns the property situated at [REDACTED] [REDACTED] which is located a short distance to the south of the Pakenham South Employment Precinct Structure Plan boundary. It is submitted that the PSP should be expanded to encompass additional land to the south of the current boundary including the land at [REDACTED], with the new preferred boundary to be Watsons Road. It is recognised that planning for this extended area is constrained by the Urban Growth Boundary (UGB) but there are compelling planning reasons for inclusion of additional land in the study area.

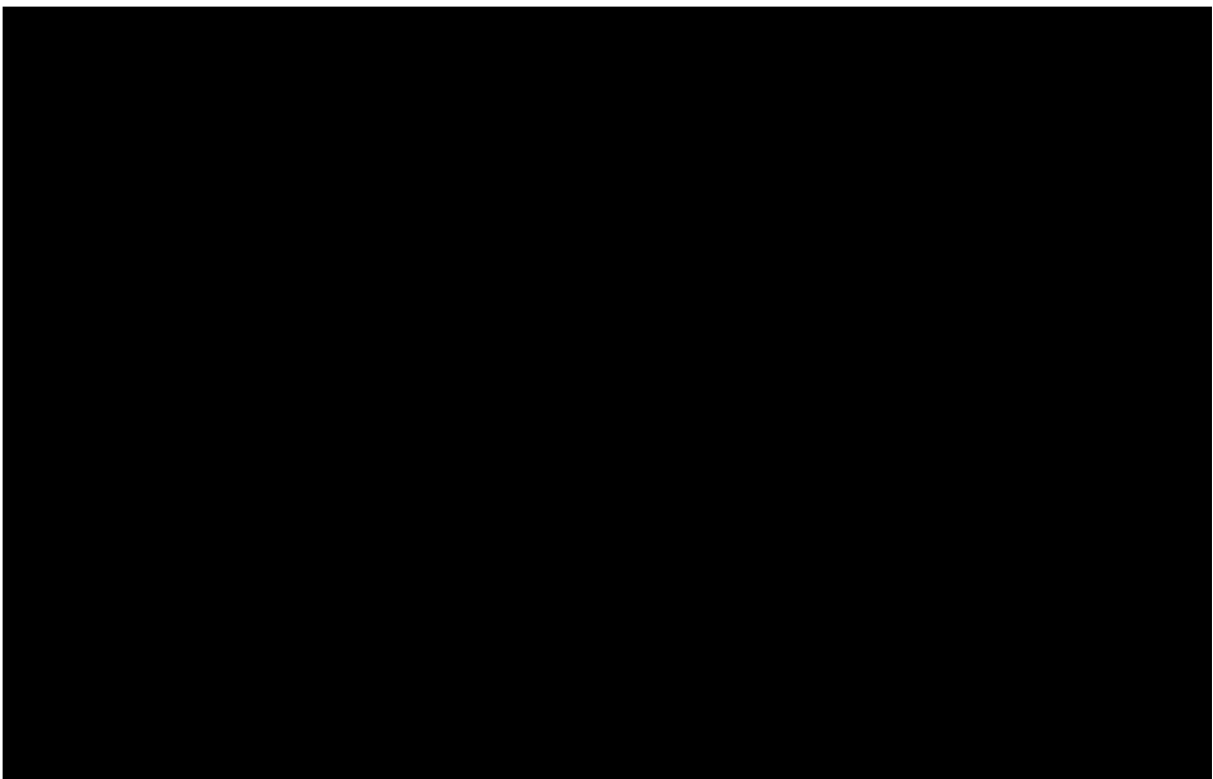


Figure 1 Zoning Plan

2 AMENDMENT C265

The nature of the amendment

Amendment C265 gives statutory effect to the Pakenham South Employment Precinct Structure Plan, which has been developed to provide for urban growth in conformity with State Government policy. The need to provide for additional employment in this location is related to the fact that rapid population growth in the south east of Melbourne has generated this need which will greatly expand in the foreseeable future. It is essential to provide for additional local job opportunities for residents of Cardinia as well as neighbouring municipalities over coming decades.

The Pakenham South Employment Precinct is located within a State Significant Industrial Precinct (SSIP), which identifies the location as essential to provide future employment options for the expanding population in the south eastern growth corridor of Melbourne.

The Effect of the Amendment

The proposed industrial employment precinct is intended to:

- provide approximately 185 hectares of industrial land with adjacent employment land rapidly nearing completion;
- allow for the creation of approximately 3,500 additional jobs for the local community; and
- provide an employment precinct of high amenity and the opportunity for local residents to work within close proximity to home, reducing commute times.

The Amendment provides for a number of statutory changes:

- Inserts Schedule 6 to the Urban Growth Zone which applies to all the land.
- Incorporate the Pakenham South Employment Precinct Structure Plan into the Cardinia Planning Scheme.
- Applies Heritage Overlay (HO14) for the heritage building and trees at 'Windarra' 40 Greenhills Road, Pakenham.
- Deletes the Heritage Overlay (HO42) from 'ITU Milking Shed' 100 Greenhills Road, Pakenham as it is no longer considered to be of local heritage significance.
- Applies a Public Acquisition Overlay (PAO7) and Incorporated Plan Overlay (IPO2) over the wetland located south of the precinct.
- Includes additional native vegetation provisions due to no vegetation having been identified to be retained in the Biodiversity Conservation Strategy.
- Introduces referral requirements to South East Water for planning permits within the Pakenham Water Recycling Plant buffer.

While this objective is fully consistent with Plan Melbourne and State Government policy, a widened area would greatly enhance the potential of the precinct.

3 COMPATIBILITY WITH STATE GOVERNMENT POLICY

The amendment is viewed in the context of rapid population growth which is expected in Melbourne over the next 35 years with the need for 4.1 million new jobs by 2051. This will require the provision of another 857,000 jobs by 2031, and another 1.8 million jobs by 2051.

The Melbourne Industrial and Commercial Land Use Plan builds on policies, strategies and actions set out in the Plan Melbourne Implementation Plan which aims to ensure enough well-priced industrial and commercial land is available in the right locations.

The Officer/Pakenham Employment area is vital for the future provision of jobs for the growing population of the south eastern region. The Southern SSIP based on Dandenong, has traditionally been the main focus for employment in the south east but is severely constrained by a lack of available land for future employment growth. Based on current rates of consumption, vacant land supply in Dandenong will be exhausted within the next two years. With little opportunity available for additional industrial land in this location, the role of the Pakenham/Officer SSIP will be critical in providing for industry needs into the future.

The map below provides an excerpt of the key industrial precincts within the Southern Precinct;

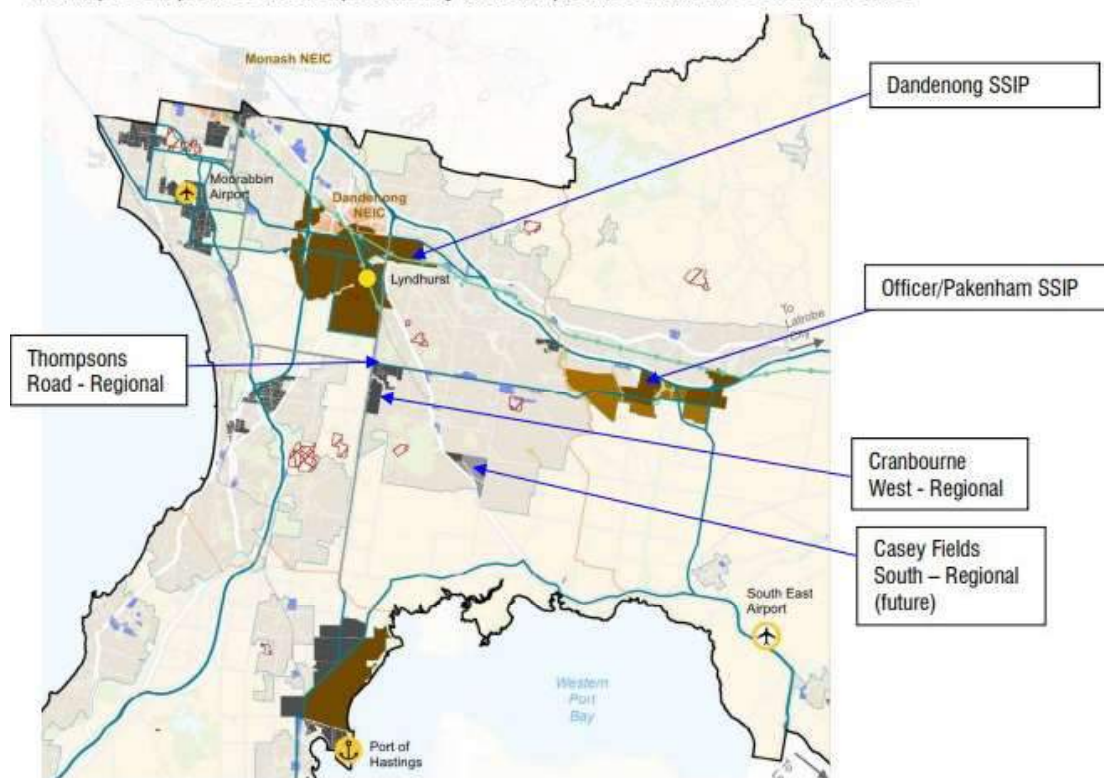


Figure 2 State Significant Industrial Precincts

It is clear that the officer-Pakenham SSIP is the major growth option for employment in South Eastern region. The Port of Hastings industrial area is constrained by a requirement that industrial development in that precinct must be associated with the function of the Port of Hastings, the future of which is doubtful. Without significant promotion of the Officer-Pakenham SSIP and provision of adequate employment land, the opportunity for employment growth in the South-eastern region of Melbourne will be significantly degraded. The consequence of such inaction will be the loss of jobs to the northern and western corridors of Melbourne.

Considering the road and transport infrastructure available to Officer-Pakenham SSIP and its proximity to the likely third Melbourne airport at Koo-wee Rup, consideration should be given to extending the boundary of the precinct. It is acknowledged that the existing urban growth boundary limits the option for further expansion of the SSIP at the current time but this restriction should be reviewed as a pressing policy consideration. A review of anomalies in the Urban Growth Boundary is overdue and this area should be a major focus of any re-examination of the boundary.

4 RECOMMENDED EXTENSION OF THE PRECINCT STRUCTURE PLAN BOUNDARY

It appears that the current boundary has been formed having regard to a bypass extending from the Koo-Wee Rup bypass to the princes Fwy, however this alignment has yet to be confirmed and does not form part of any incorporated planning document. The effect of the by-pass when constructed, will be to greatly enhance the potential of prospective employment land to both the north and the south. The proposed by-pass will provide for significantly improved access to the regional road and freight distribution network.

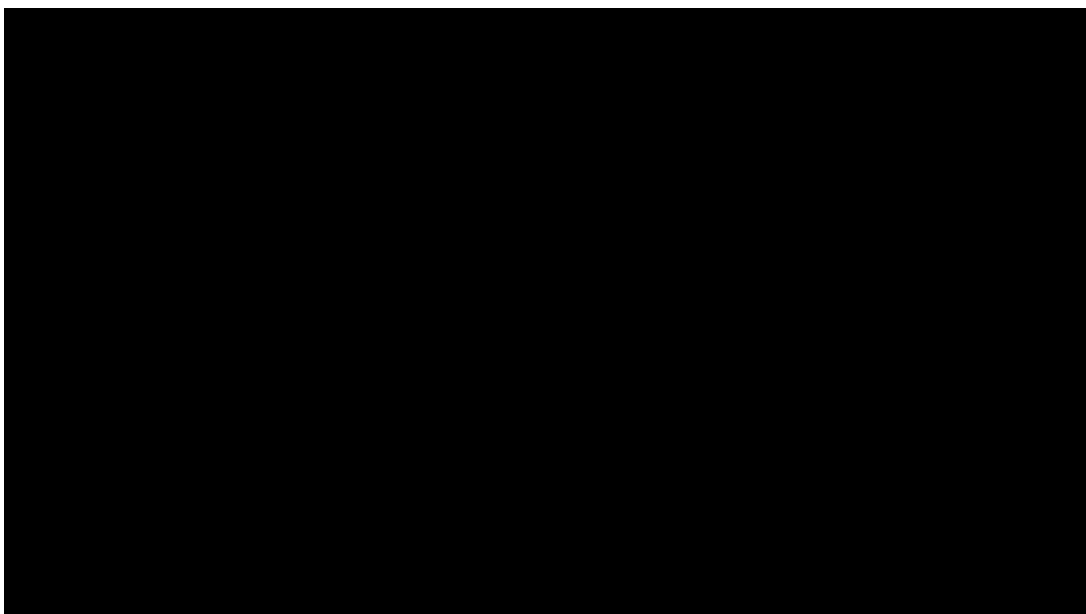


Figure 3: Proposed UGB extension

A more appropriate boundary of the precinct would be Watsons Road. It would provide a more identifiable boundary while opening up the opportunity to utilise very strong transport connections to Princes Freeway via the Koo Wee Rup Bypass. Interchanges are proposed at McGregor Rd and the Pakenham bypass connecting to Koo Wee Rup Road. Watsons Rd is a logical boundary which aligns with the location of urban zoned land along the Princes Freeway corridor.

The significance of this area for future employment growth is clearly demonstrated as being consistent with State Government policy for strengthening the officer/Pakenham SSIP.

Perry Town Planning

November 2020

Cardinia Shire Council (Strategic Growth Area Planning)
Amendment C265
PO Box 7
PAKENHAM VIC 3810

25 November 2020

Dear Sir/Madam

It is with great pleasure that I write to you my letter of support for the current proposal of Amendment C265.

As a current landowner in the Pakenham South Employment Precinct Structure Plan area, I would like to take this opportunity to share my full support of the Cardinia Shire Council and the amendment process which is currently being undertaken.

As we continue to navigate through a COVID-19 recovery, opportunities to create economic benefit and employment in our region is paramount. Once adopted, Amendment C265 and the development of the Pakenham South Employment Precinct Structure Plan area which will follow, will deliver on this. Capital will be added back into our economy and multiple employment opportunities, both short and long term, will be created for many across the region.

With our development alone we see \$83mil in civil works to be injected into our region, benefiting many local businesses and communities across Cardinia. Also, we anticipate our development will create over 2,600 new jobs. With Victoria's current unemployment rate at 6.7%, we know these jobs are desperately needed. We also look forward to facilitating the Greenhills Road and Koo Wee Rup Road expansions, to improve traffic flow in the area.

The [REDACTED] and I personally, very much appreciate the opportunity to put forward our support for this amendment. We look forward to our continued working relationship as we work toward great outcomes for the Cardinia Shire community.

Please also see enclosed a detailed response completed by Planning Central on our behalf.

Warmest regards

[REDACTED]

Encl.

Ref: 17095 – Pakenham South

25 November 2020

Planning Department
Cardinia Shire Council
P O Box 7
PAKENHAM VIC 3810

mail@cardinia.vic.gov.au



ACN 161 565 902
ABN 68 625 299 632

PO Box 2301
Oakleigh, Vic 3166

Dear Sir / Madam

**RE: CARDINIA AMENDMENT C265 - SUBMISSION
PAKENHAM SOUTH EMPLOYMENT PSP**

Planning Central Pty Ltd continues to act on behalf of [REDACTED] who has an interest in land at [REDACTED]

This land is located within the Pakenham South Employment Precinct Structure Plan (PSP) area, [REDACTED] – as depicted below.

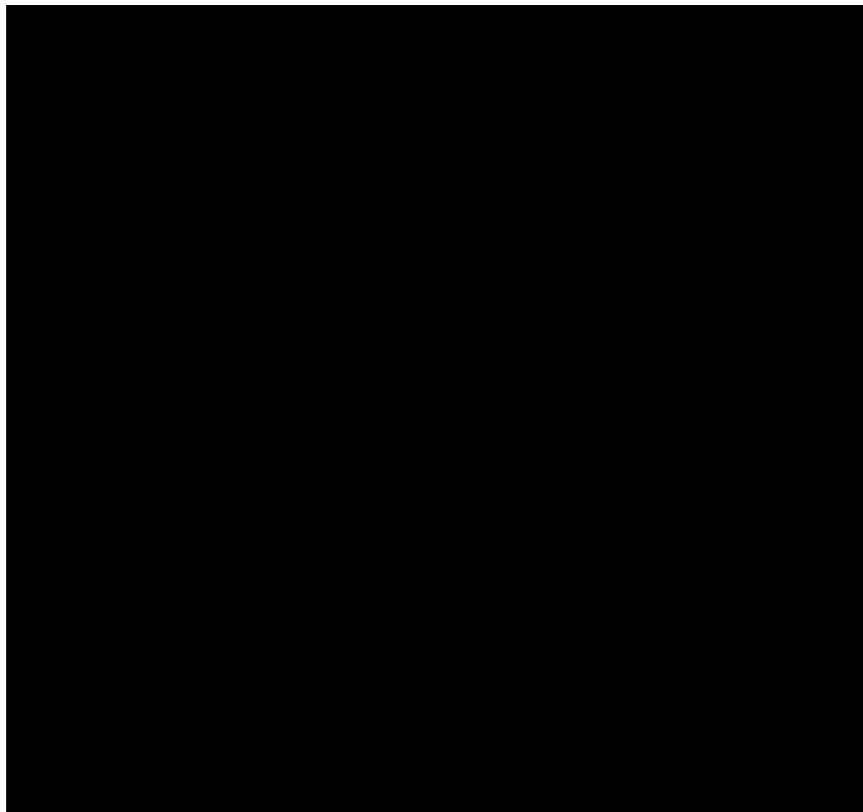


Figure 1 - Location Plan
Source : LASSI
Not to Scale



As depicted in the following plan, the [REDACTED] Land:

- is irregular in shape.

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

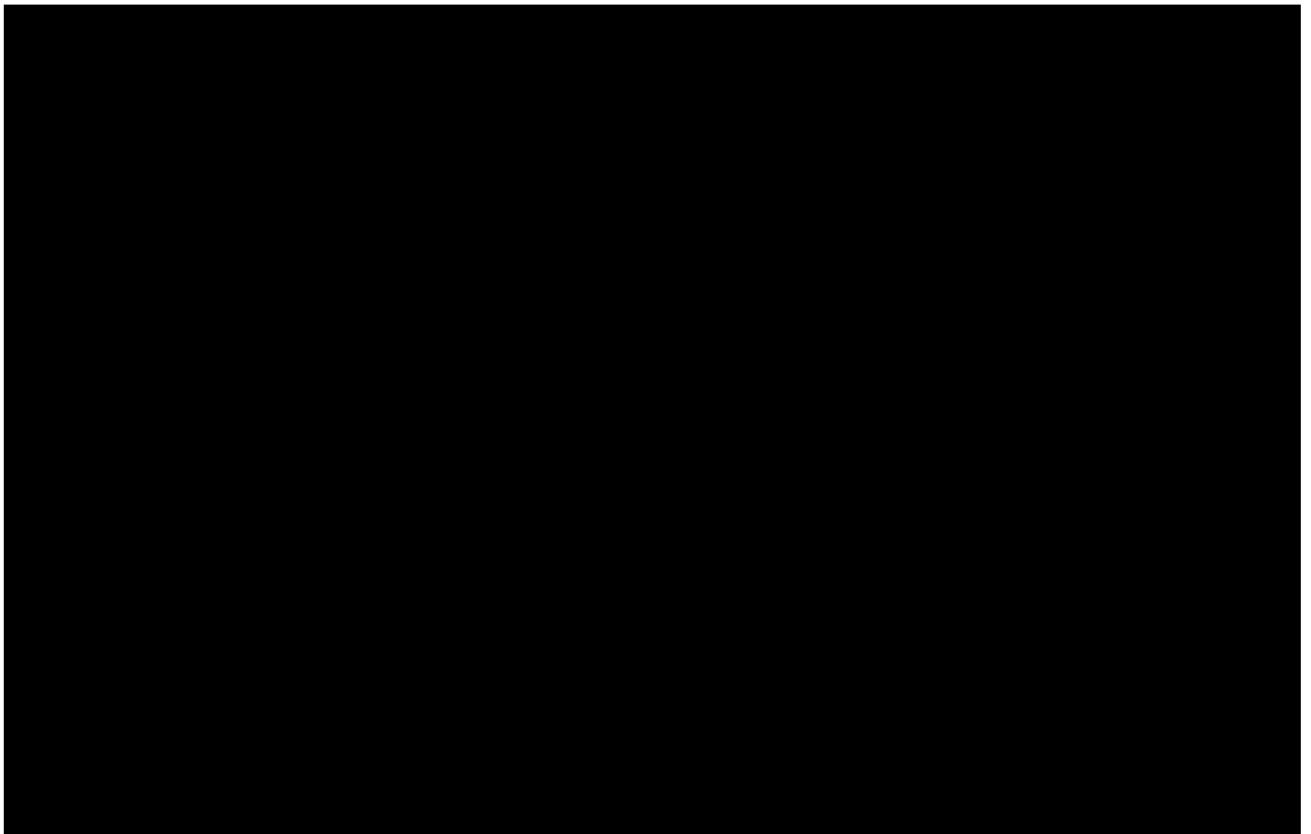



Figure 2 - Aerial Photo
Source: LASSI
Not to Scale

The Pakenham South Employment PSP has been under preparation for the past three (3) years. In that time, [REDACTED] has actively participated in this project as a significant landowner, through:

- Attendance in project co-ordination meetings.
- Funding plans and technical assessments.
- Reviewing draft documents.



Council have now released Amendment C265 for public exhibition. In short and as related to the [REDACTED], this Amendment seeks to:

1. Incorporates the Pakenham South Employment PSP (October 2020) into the Cardinia Planning Scheme.
2. Applies the Schedule 6 to the Urban Growth Zone to facilitate development in line with the PSP.
3. Amends the Schedule to Clause 45.01 Public Acquisitions Overlay (PAO) to include planning scheme map PAO7 which will be applied to the wetlands area located south of the precinct and identifies Melbourne Water Corporation as acquiring authority.
4. Amends the Schedule to Clause 52.17 to provide an exemption from requiring a planning permit to clear native vegetation where it is carried out in accordance with approvals made pursuant to Section 146B of the Environment Biodiversity Conservation Act 1999.
5. Amends the Schedule to Clause 66.04 to require referrals for planning applications within the Pakenham Water Recycling Plant buffer to South East water.

Having reviewed the Amendment documentation, we wish to state / submit that [REDACTED] :

1. remains committed to the earliest approval of the amendment and development of the land with Council support to advance economic development with the municipality and the wider region. This commitment is reinforced in the Cover Letter.
2. supports Amendment C265 in principle based on the ability to advance technical assessments and a "ghost application" for the subdivision of their land in parallel to the amendment ... noting the potential risks in the event that the PSP / amendment may be modified prior to final approval. We would appreciate a detailed discussion regarding the plan and assessment requirements for an application to guide this ghost application.
3. would like to:
 - discuss Council's intentions to prepare a separate amendment for the Infrastructure Contributions Plan and associated Overlay, which we understand will be sought under Section 20(4) of the Planning and Environment Act 1987 to be approved by the Minister for Planning to support the implementation / funding of the Infrastructure Works - after Amendment C265 has been approved.
 - clarify what level of works / interim intersection treatment is sought for Healesville / KooWeeRup Road.

Though these discussions, our client wishes to ensure that they have a clear understanding of their infrastructure costs and liabilities at the earliest possible time.

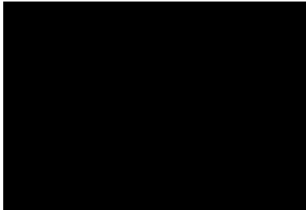
4. flag their intent to apply to Council within the next fortnight for a separate planning permit for preparatory fill / earthworks, with necessary plans and technical assessments, and trust that this application will be processed expediently.



We look forward to engaging with Council over coming weeks / months and participating in the progression of this Amendment through to approval.

Should you wish to discuss any aspect, do not hesitate to contact the undersigned directly on [REDACTED] or at [REDACTED]

Yours faithfully,



Planning Central Pty Ltd

To Whom It May Concern,

Exhibition of Amendment C265card to the Cardinia Planning Scheme (Pakenham South Employment Precinct Structure Plan)

Thank you for the opportunity to provide comment on the above planning scheme amendment. The Department of Environment, Land, Water and Planning (DELWP) Melbourne Strategic Assessment (MSA) Team has reviewed the documents associated with the amendment and provides the attached submission.

DELWP MSA generally supports the draft documents subject to changes outlined in the submission. Please note the comments regarding the permit exemption included in Clause 52.17 for the removal of native vegetation, and Councils decision on whether any identified vegetation should be excluded from that exemption.

We look forward to continuing to work cooperatively with the Cardinia Shire Council and are available to discuss our submission.

If you have any questions, please contact feel free to contact me.

Cheers,

[REDACTED] | Project Officer | Melbourne Strategic Assessment
Environment and Climate Change | Department of Environment, Land, Water and Planning

Lvl 2, 8 Nicholson Street, East Melbourne, 3002
609 Burwood Highway, Knoxfield, Victoria 3180

[REDACTED] | W: www.msa.vic.gov.au



Please consider the environment before printing this email

Pakenham South Employment Precinct Structure Plan

Submission by the Department of Environment, Land, Water and Planning, Melbourne Strategic Assessment Team to the Draft Pakenham South Employment Precinct Structure Plan

Item	Comment	Model content
PSP – 3.3.2 Biodiversity, Threatened Species and Native Vegetation Retention	<p>Remove reference to Habitat Compensation arrangements under section 3.3.2. Following the introduction of the <i>Melbourne Strategic Assessment (Environmental Mitigation Levy) Act 2020</i> in July 2020 habitat compensation fees are no longer required. Offset requirements under the MSA program are now regulated through the MSA Act.</p> <p>3.3.2 Biodiversity, Threatened Species and Native Vegetation Retention</p> <p>The Commonwealth Department of Environment and Energy has granted an approval for urban development in Melbourne's Growth Corridors under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). This approval covers the Pakenham South Employment Precinct.</p> <p>Provided the conditions of this approval are satisfied, individual assessment and approval under the EPBC Act is not required. These conditions include but are not limited to the following:</p> <ul style="list-style-type: none">Urban development must comply with habitat compensation arrangements and fees described in 'Habitat compensation under the Biodiversity Conservation Strategy – Melbourne Strategic Assessment (Victorian Government Department of Environment and Primary Industry, August 2013) and as amended by the Victorian Government from time to time. <p>The Biodiversity Conservation Strategy (BCS) does not include any mapped conservation areas within the Pakenham South Employment PSP. Therefore, no land is identified for protection under the BCS.</p>	<p>"The Commonwealth Department of Environment and Energy has granted an approval for urban development in Melbourne's Growth Corridors under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). This approval covers the Pakenham South Employment Precinct. Provided the conditions of this approval are satisfied, individual assessment and approval under the EPBC Act is not required.</p> <p>The Biodiversity Conservation Strategy (BCS) does not include any mapped conservation areas within the Pakenham South Employment PSP. Therefore, no land is identified for protection under the BCS."</p>

Pakenham South Employment Precinct Structure Plan

Item	Comment	Model content			
Schedule to clause 52.17 Native Vegetation	Updated the wording to the relevant native vegetation removal exemption in the schedule to clause 52.17-1 to reflect the introduction of the MSA Act.	Model content for if no native vegetation to be retained within the precinct:			
	<table><tr><td>Land shown as Urban Growth Zone 6 for the Pakenham South Employment precinct</td><td>All native vegetation removal, destruction or lopping of which is required for any development that is subject to and carried out in accordance with 'Final approval for urban development in three growth corridors under the Melbourne urban growth program strategic assessment, 5 September 2013' made pursuant to Section 146B of the <i>Environment Protection and Biodiversity Conservation Act 1999 (Cth)</i>. This does not apply to native vegetation or scattered trees identified as to be retained in a precinct structure plan incorporated in this scheme.</td></tr></table>	Land shown as Urban Growth Zone 6 for the Pakenham South Employment precinct	All native vegetation removal, destruction or lopping of which is required for any development that is subject to and carried out in accordance with 'Final approval for urban development in three growth corridors under the Melbourne urban growth program strategic assessment, 5 September 2013' made pursuant to Section 146B of the <i>Environment Protection and Biodiversity Conservation Act 1999 (Cth)</i> . This does not apply to native vegetation or scattered trees identified as to be retained in a precinct structure plan incorporated in this scheme.	<table><tr><td>Land shown as Urban Growth Zone 6 for the Pakenham South Employment precinct</td><td>All native vegetation in the levy area within the meaning of the Melbourne Strategic Assessment (Environmental Mitigation Levy) Act 2020.</td></tr></table>	Land shown as Urban Growth Zone 6 for the Pakenham South Employment precinct
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Land shown as Urban Growth Zone 6 for the Pakenham South Employment precinct	All native vegetation in the levy area within the meaning of the Melbourne Strategic Assessment (Environmental Mitigation Levy) Act 2020.				
	<p>Note: Currently the Native Vegetation Plan (Plan 8) shows no native vegetation as to be retained. DELWP has no requirement for the retention of native vegetation within this precinct. However, if Council wish for any native vegetation to be excluded from the c.52.17 permit exemption, it must be identified on the plan as to be retained. Alternative model content is provided for if this is the case.</p>	Model content for if any native vegetation is to be identified as to be retained in the precinct:			
		<table><tr><td>Land shown as Urban Growth Zone 6 for the Pakenham South Employment precinct</td><td>All native vegetation in the levy area within the meaning of the Melbourne Strategic Assessment (Environmental Mitigation Levy) Act 2020. This does not apply to native vegetation identified as to be retained in a precinct structure plan incorporated in this scheme.</td></tr></table>	Land shown as Urban Growth Zone 6 for the Pakenham South Employment precinct	All native vegetation in the levy area within the meaning of the Melbourne Strategic Assessment (Environmental Mitigation Levy) Act 2020. This does not apply to native vegetation identified as to be retained in a precinct structure plan incorporated in this scheme.	
Land shown as Urban Growth Zone 6 for the Pakenham South Employment precinct	All native vegetation in the levy area within the meaning of the Melbourne Strategic Assessment (Environmental Mitigation Levy) Act 2020. This does not apply to native vegetation identified as to be retained in a precinct structure plan incorporated in this scheme.				

Our Ref: 5011169

26 November 2020

Cardinia Shire Council
Growth Area Planning
PO Box 7 P
PAKENHAM VIC 3810

Attention: Michelle Nichols
Senior Strategic Planner – Growth Area Planning

Sent via email: mail@cardinia.vic.gov.au

Dear Ms Nichols

CARDINIA PLANNING SCHEME AMENDMENT C265 – PAKENHAM SOUTH EMPLOYMENT PRECINCT STRUCTURE PLAN

Planning Scheme Amendment C265 proposes to transform approximately 185 hectares of land in Pakenham South to employment land. The area forms part of the 'Pakenham/Officer State Significant Industrial Precinct' identified by the Victorian Government for future industrial land. As such, the Pakenham South Employment Precinct Structure Plan has been prepared to deliver approximately 3,500 job opportunities to the local community.

Our Understanding of the Proposal

The land affected by the amendment is approximately 185 hectares of land in Pakenham generally bound by Greenhills Road to the north, Healesville-Koo Wee Rup Road to the east, Green Wedge zoned land to the south and McGregor Road to the west.



The amendment proposes to incorporate a new document into the Cardinia Planning Scheme titled *Pakenham South Employment Precinct Structure Plan* (the PSP).

The amendment also rezones the land to an Urban Growth Zone Schedule 6 (UGZ6) to facilitate the development of the land generally in accordance with the PSP, and makes a number of other consequential changes to the Cardinia Planning Scheme to support the implementation of the PSP. The Industrial 1 Zone (IN1Z) will be the applied zone to the predominant use of the land (industrial) within the Precinct.

It is understood that the PSP forms part of a larger employment area identified as the Precinct Structure Plan Pakenham Employment Area (Stage 1 PSP06) comprising:

- South East Business Park (168 hectares of existing industrial employment land);
- Livestock Exchange (110 hectares of existing industrial employment land); and
- Pakenham South Employment (185 hectares of future employment land).

The South East Business Park and Livestock Exchange have been developed with a mix of industrial land uses and do not form part of this proposed PSP.

Documents reviewed in preparation of response:

- Proposed Schedule 6 to Clause 37.07 Urban Growth Zone;
- Proposed Schedule to Clause 66.04 Referral of Permit Applications under Local Provisions;
- Draft Pakenham South Employment Precinct Structure Plan Incorporated Document dated October 2020; and
- Amendment C265card Explanatory Report

Previous Advice

EPA has previously responded to the proposed PSP; most recently providing a letter response dated 20 December 2019 (EPA Ref. 5009231) which followed on from comments for Council's consideration via earlier letters dated 13 July 2017 (EPA Ref: 5007570) and 12 March 2019 (EPA Ref: 5009231).

EPA's advice has centred on several key issues relating to potential risk of harm to amenity and human health as a result of pollution and waste. Specifically:

- The need to recognise the presence of existing industry that requires separation distances for sensitive uses including South East Water's Pakenham Water Recycling Plant (wastewater treatment plant), the Pakenham Abattoir and food production premises located to the south east of the PSP; and
- The need to have regard to Ministerial Direction No. 1 Potentially Contaminated Land as it relates to the current and historical use of land and proposed future uses;

Current Submission

EPA recognises that the PSP is a long-term strategic plan to guide urban development and enable the transition of non-urban land to urban land. Importantly, the subject site forms part of the State significant industrial precinct in Melbourne's south east growth corridor. Reiterating earlier advice, EPA wishes to make the following comments:

Recognising Existing Industry

There is a need for the PSP to recognise the presence of existing industry that requires separation distances for sensitive uses including:

- South East Water's Pakenham Water Recycling Plant (wastewater treatment plant);
- the Pakenham Abattoir and food production premises located to the south east of the PSP.

It is noted that it is a requirement (R1) that *"Industry and associated businesses must address relevant buffer distances to existing uses (refer Appendix B)."*

South East Water's Pakenham Water Recycling Plant

The SEW Pakenham WRP is located adjacent to the south-east boundary of the PSP boundary. The WRP is recognised by EPA as critical infrastructure which has the potential to generate offsite impacts (odour) which may impact on sensitive uses. For this reason, EPA has considered the need for the PSP to include consideration of potential odour impacts and the need for an appropriate separation distance to be incorporated into the PSP itself.

Referring to Appendix B to the PSP Incorporated Document:

"South East Water intends to treat all sewage from the Clyde, Officer and Pakenham areas at an expanded Pakenham Water Recycling Plant (WRP) site. South East Water, in coordination with Council, has produced a forecast for sewage treatment at Pakenham WRP. Based on this forecast the treatment plant will service an equivalent population of 460,000 people by 2060. This will require significant upgrades to onsite infrastructure for South East Water and may, at times, have offsite impacts such as noise and odour on nearby land uses.

In accordance with EPA Guidance Publication 1518 – Recommended separation distances for industrial residual air emissions, a mechanical sewage treatment plant as is planned for Pakenham should maintain a separation distance of 770m from sensitive receptors. Based on this guidance South East Water recommends an area extending 770m from South East Water's boundary on the eastern edge of the Pakenham South Employment PSP be noted within the PSP as potentially impacted by offensive odours. Planning controls and advice within this area to restrict uses that may be negatively impacted by this odour are recommended."

Previous EPA advice noted that "... while no sensitive uses are proposed near the Pakenham WWTP, Council should have regard to the impact the proposed future development may have on this important infrastructure and provide the necessary framework for it to be protected from inappropriate encroachment. This can include an assessment of odour impacts via field surveys and assessment reports and delineation of 'no go' zones for future sensitive uses."

It is noted that the exhibited PSP Incorporated Document and Amendment proposes to:

- include as an objective of the PSP to:
"Ensure separation distance from the Pakenham Water Recycling Plant is utilised to guide the pattern of uses and development in the precinct."
- introduce an 'odour' buffer as shown on page 55 which indicates the boundary of the area recommended as being listed as odour affected in the PSP by South East Water;
- introduce permit requirements for uses that would otherwise not require a planning permit if they are proposed in the buffer and could, as defined by Council, be sensitive to potential odour such as food and drink and informal outdoor recreation; and
- introduce referral requirements to South East Water for planning permits for uses within the Pakenham Water Recycling Plant 'odour' buffer under the status of 'recommending referral authority'. This includes referral of planning permit applications to use land for 'Convenience shop, Crop raising, Home based business, Informal outdoor recreation, Service station, or Take away food premises'.

EPA supports the steps taken by Council to recognise this existing industry and manage impacts on existing sensitive uses as well as the planned long term growth in the area.

Whilst we do not object to the inclusion of the proposed referral requirement, which we assume to be a response to engagement and issues raised by South East Water, we note that with the exception of 'home based business' and 'informal outdoor recreation', 'Convenience shop, Crop raising, Service station, or Take away food premises' do not fall within the definition of 'sensitive uses' as considered by EPA. These uses are not expected by EPA to be sensitive to the impacts of odour from an amenity or human health perspective.

Abattoir and Food Production Premises

Referring to Appendix B to the PSP Incorporated Document:

The Pakenham Abattoir and food production premises is situated directly east of the southern boundary of the PSP area. The existing abattoir is subject to EPA's Scheduled Premises Regulations 2017 and has a separation distance of 500 metres from sensitive uses. As the source of the production is located almost 1 kilometre east of the Healesville-Koo Wee Rup Road, their 500 metre separation distance (buffer) does not currently extend to the proposed PSP precinct.

On this basis it would appear that there is no specific response required to be included in the PSP and Amendment itself and the 'odour' buffer can be limited in that it applies to impacts associated with the Pakenham WRP and not the abattoir and food production premises.

Potentially Contaminated Land

Having regard to Ministerial Direction No. 1 Potentially Contaminated Land, EPA has considered the need for the PSP to have regard to potentially contaminated land as it relates to the current and historical use of land and proposed future uses.

The Explanatory Report confirms that *"Ministerial Direction No. 1 does not strictly apply to the land affected by the amendment as the amendment is proposing to rezone land that has typically been used for various agricultural uses rather than industrial uses.*

A desktop assessment has been carried to inform the potential for contamination to be present. The assessment identified possible chemical and fuel storage (currently or formally) in the precinct. However, the overall potential for contamination to be present was considered low."

While agricultural land cannot be assumed not to carry any risk in regards to potential contamination, EPA notes that on the basis of the assessment carried out to date, it would appear that there is no specific response required to be included in the PSP and Amendment itself in respect of potentially contaminated land. This view takes into account the Amendment seeks to facilitate a range of employment and industrial uses, and not sensitive uses such as residential accommodation.

Closing

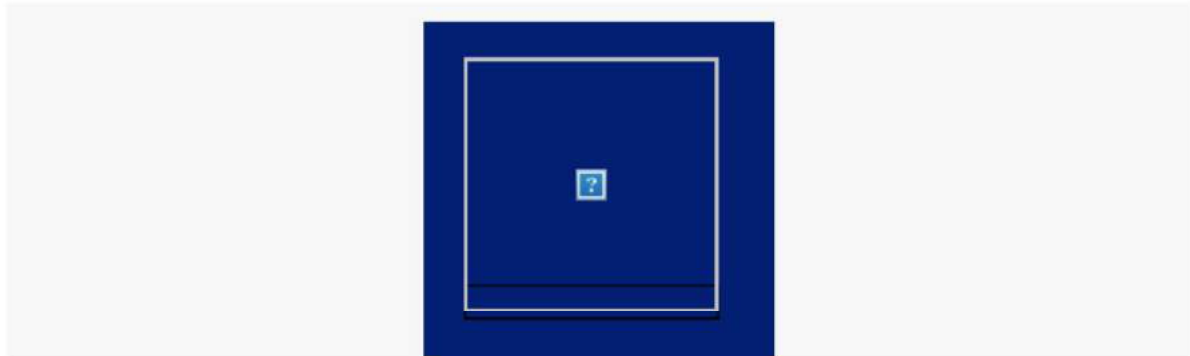
EPA supports the steps taken by Council to recognise this existing industry and manage impacts on existing sensitive uses as well as the planned long term growth in the area. In assessing further site specific applications for use and development, Council should consider whether there is any further need for environmental site assessment to determine whether the subject land is suitable for the intended use in accordance with Ministerial Direction No. 1.

We do not wish to be heard in support of this submission. However, we are available to meet to discuss the proposal in the event that any material changes are made that would impact on the advice given by EPA. Please contact our Planning Team Lead-Strategic, [REDACTED], on 1300 EPA VIC (1300 372 842).

Yours sincerely,

[REDACTED]

Team Leader – Land Use Planning Delivery
Major Projects and Planning Unit
EPA Victoria



C265 Online Submission Form Form Submission

There has been a submission of the form C265 Online Submission Form through your Creating Cardinia website.

Please tick to indicate you have read our privacy collection notice

Yes

Give reasons why you support or not support this amendment.

We do not support this amendment for the following reasons:

- (1) The consideration of the issues around further supply and demand for employment uses is premature, considering the location of this proposed PSP within the State Significant Industrial Area of Pakenham / Officer. The existing Cardinia Road Employment PSP has not yet reached capacity, nor is it forecast to do so in the medium term. Investing in further land supply at this stage will not allow it to reach that capacity, until the longer term.
- (2) It would appear that thorough analysis of the impact of any additional employment land, within the Cardinia Corridor, on existing and proposed PSPs located to the west of this proposed amendment, has not been sufficiently considered.
- (3) The SGS background Economic study indicates that there exists more than

sufficient supply of employment land, within this corridor, without the additional supply of land proposed in this PSP.

(4) A more logical approach to the strategic planning of this whole corridor, would be to review the existing Cardinia Road Employment PSP (land supply vs demand etc), together with a review of the under preparation Officer South Employment PSP, before further releasing more land supply to the corridor. Whilst not currently under preparation by the VPA, it is also prudent to consider the timing of the future Pakenham West Employment PSP, and its consequent impacts.

(5) The Cardinia Road Employment PSP (where our land is based), clearly outlines that a "precinct based approach has been adopted to enable growth and development in the Cardinia Employment Corridor to be effectively managed...the release of additional land in the Corridor should be discouraged, until the commercial area within the precinct has significantly established". The PSP now proposed under amendment C265, provides a direct conflict with that approach.

Are there any changes to the amendment that would address your concerns?

We are of the view that a thorough review of the whole Cardinia Employment Corridor is necessary, prior to the approval of this proposed amendment. In particular this review should include a detailed analysis of the Cardinia Road Employment PSP, and how strategic planning can help it achieve the vision of providing a strong commercial hub for the wider corridor.

Provide further comment here or upload images or documents below the text box

Not applicable

First Name

████

Last Name

████

Contact number

████████

Email address

████████████████████

Home address

██

Organisation name

████████

Organisation address

[REDACTED]

How do you preferred to be contacted?

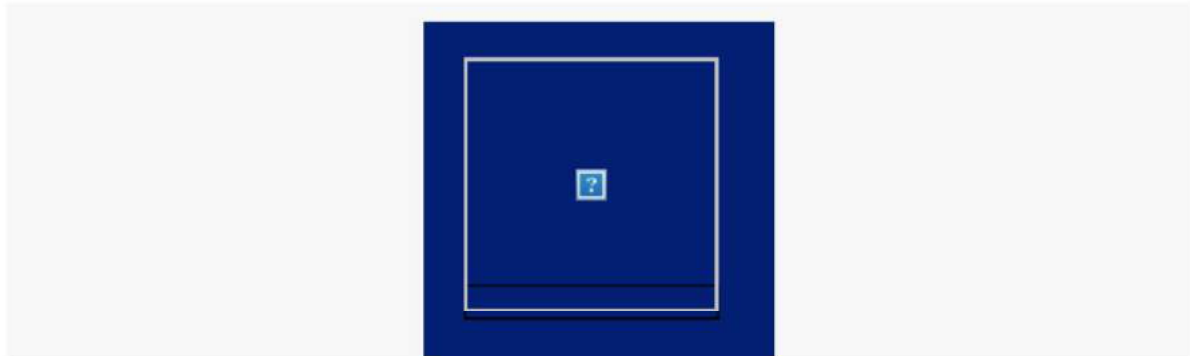
Email

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C265 Online Submission Form Form Submission

There has been a submission of the form C265 Online Submission Form through your Creating Cardinia website.

Please tick to indicate you have read our privacy collection notice

Yes

Give reasons why you support or not support this amendment.

The subject PSP is part of the Cardinia Employment corridor.

The Cardinia Road Employment precinct (CREP) is also in this corridor.

The CREP says that land covered by the CREP will be given time to get traction before employment land in other PSPs will be released. There has been no take up of employment land in the CREP to date so traction by definition can not have been achieved yet. Therefore further release of employment land should not occur yet.

The CREP says that land releases will be done to match demand. The lack of development of CREP land demonstrates there is already more supply of employment land than there is demand.

There are hundreds of hectares of land awaiting development in CREP.

The land in C265 is of a very similar nature to CREP, so does not increase diversity of supply.

Allowing C265 to proceed will not stimulate demand as it will not help create a critical mass of activity in CREP or accelerate development in CREP.
Proceeding with C265 will dilute infrastructure investment that should be going to CREP to assist in its activity and development.
land in C265 will not cater for different land uses to CREP.

A key statement in the corridor strategy is that "the scale of the Cardinia Employment corridor requires the release of employment land to be carefully managed, balancing supply with demand".
The lack of take up of employment land in CREP demonstrates that proceeding with C265 will be in complete conflict with this objective.
CREP contemplates a "core" of activity being directed to CREP. This is yet to happen and release of another competing area of employment land will be the opposite of "maximising its (CREP) attractiveness to additional investment.

.... and the kicker

"...release of additional land in the Cardinia Employment Corridor should be discouraged until the commercial area within the precinct has significantly established".
THERE IS NO DEVELOPMENT IN COMMERCIAL AREA OF CREP YET.

The CREP document goes on to say that " The dispersal of investment will otherwise impact upon land uptake rates within the Precinct, adversely affecting the timing and density of jobs."

I could not agree more. The release of more land under C265 is is a total contradiction to the underlying principles that CREP was created on.

I note that CREPs ability to get get going and get traction has been inhibited by the lack of completion of the long awaited CREP review. Council resources should be directed to completing this ASAP and certainly before any further land is released in the corridor.

Are there any changes to the amendment that would address your concerns?
It should be delayed until CREP is substantially developed.

Provide further comment here or upload images or documents below the text box

My quotes were from the Cardinia Road employment precinct PSP document. A government document

First Name

[REDACTED]

Last Name

[REDACTED]

Contact number

[REDACTED]

Email address

[REDACTED]

Home address

[REDACTED]

Organisation name

[REDACTED]

Organisation address

[REDACTED]

How do you preferred to be contacted?

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Creating Cardinia.

|

D20/242986

Tracey Parker
General Manager, Liveable Communities
Cardinia Shire Council
mail@cardinia.vic.gov.au

Dear Ms Parker

Cardinia Planning Scheme Am C265, Pakenham South Precinct Structure Plan

Invest Victoria (IV) appreciates the ongoing engagement with Cardinia Shire Council regarding its work on employment PSPs. Many of the investment opportunities that IV gets involved in are of a nature that are well suited to industrial zoned land and we have an interest in the planning and future supply of such land. We also retain an interest in all employment nodes: NEICs, mixed use commercial, activity centres and health centres.

IV supports the draft Pakenham South PSP and provides the following high-level comments on the exhibited Planning Scheme Am C265 and related matters:

COVID-19

COVID-19 has profoundly impacted the way Victorians are working in 2020. Working from home in particular has become commonplace for many during COVID restrictions and could have ongoing impacts on where people work and their commuting patterns. Potential COVID-19 implications for Precinct Structure Planning are yet to be properly understood. It is noted that the Victorian Planning Authority identified COVID as an important issue in the preparation of the South East Economic Corridor.

The economic impacts of COVID are likely to play out differently by industry sector. Early indications suggest that sectors that typically locate within industrial precincts may be less disrupted and that industrial areas are likely to continue to perform strongly. Whether there may be COVID implications on PSP place-based planning will no doubt be of interest to planning authorities and agencies.

Melbourne Industry and Commercial Land Use Plan (MICLUP)

The Melbourne Industrial and Commercial Land Use Plan (MICLUP) released earlier this year builds on Plan Melbourne policies on supplying enough industrial and commercial land in the right locations. As noted in the MICLUP, the Officer-Pakenham SSIP will play a lead role in the supply of industrial land. Supply of industrial land in the Southern SSIP is expected to become exhausted by the mid-2020s, with demand likely to transfer to neighbouring, regionally

significant industrial areas. Development will progressively move to the Officer-Pakenham SSIP, which accounts for some 80 per cent of unzoned industry land in the region. The availability of this land is dependent on future planning for these areas as part of the PSP process. We therefore recognise the importance of the work being undertaken by Cardinia Council for the Pakenham South PSP.

South East Economic Corridor (SEEC)

We supported the preparation of the South East Economic Corridor (SEEC) report as being a key component of the strategic framework to guide economic development and employment growth in Melbourne's South East. As noted in the SEEC, the report helps to define the strategic role of employment PSPs and supports with drafting instructions for e-PSPs.

The SEEC dashboard for Pakenham South outlines a Future Urban Structure, consistent with Council's draft PSP. The strategic context and competitive advantages for Pakenham South are identified, along with target industry sectors. In addition to freight and logistics, and food production, it is noted that other opportunities such as energy production and resource recovery are identified.

The SEEC outlines three horizons to 2060, across which development progressively augments and transforms. It is noted that the jobs target is slightly lower than the target provided in the draft Pakenham South PSP.

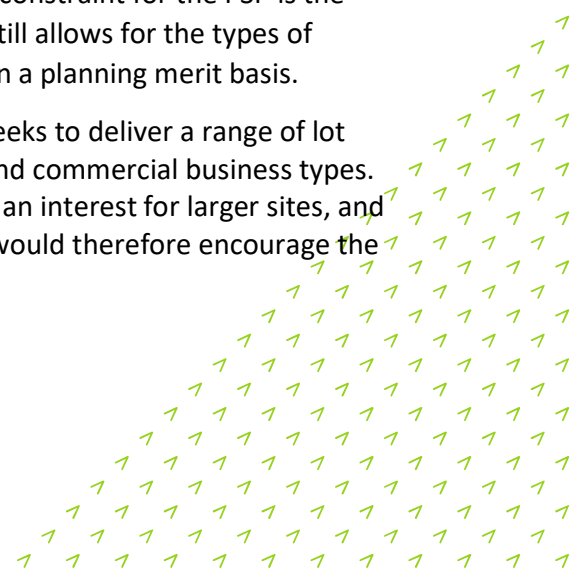
Pakenham South PSP

Council's preparation of the draft Pakenham South PSP implements the land use intentions of the South East Growth Corridor and the Officer-Pakenham SSIP. It provides that the primary land uses for the PSP are light industry, freight and logistics and manufacturing. We strongly support policy consistency with the SSIP. Land designated for these economic uses has an important regional and metropolitan role, although these uses may not involve high job densities. We understand that the jobs estimate for Pakenham South has been based on the SSIP land uses.

Additional comments on precinct topics are provided below:

Industrial Zoning: The PSP designates the application of Industrial 1 Zone. We understand that consideration was given to applying Industrial 2 Zone, but that a constraint for the PSP is the interface with sensitive uses to the west. The Industrial 1 Zone still allows for the types of potential land uses identified for the precinct to be considered on a planning merit basis.

Lot sizes: With regard to lot sizes, the draft PSP at Objective 2 seeks to deliver a range of lot sizes that are capable of accommodating a variety of industrial and commercial business types. The experience of Invest Victoria site search requests has shown an interest for larger sites, and that availability of such sites in the south-east can be tight. We would therefore encourage the inclusion of larger lots where possible.



Under Guideline 14 the PSP seeks that *'subdivision design should provide for a range of lot sizes capable of accommodating a variety of business types which maximise job yield'*. The land use purpose of SSIPs includes activities such as freight and logistics which typically involve low job densities and larger lot sizes. Guideline 14 may require revision or clarification in its intended purpose.

Alternative Energy: We are aware that the VPA is proposing the preparation of the tool 'Alternative Energy in the Greenfields' as part of the PSP Guidelines review. Scheduled electricity outages, or 'brownouts', are experienced by industry operators and is an issue in terms of reliable energy and production. The merits of alternative energy, to supplement network transmission, could be considered. In any event careful consideration of the need for reliable electricity, through PSP infrastructure servicing planning, would be appropriate.

Resource Recovery: It is noted that the SEEC identifies potential opportunities for the complementary energy/recycling activities within the Water Treatment Plant buffer, or resource recovery plants generally. Plan Melbourne had intended that PSP Guidelines, when revised, should address waste and resource recovery infrastructure. Council will be aware 'Recycling Victoria a New Economy' was released earlier this year, promoting the circular economy. Further related policy is being led by DELWP, including a framework for the waste to energy sector.

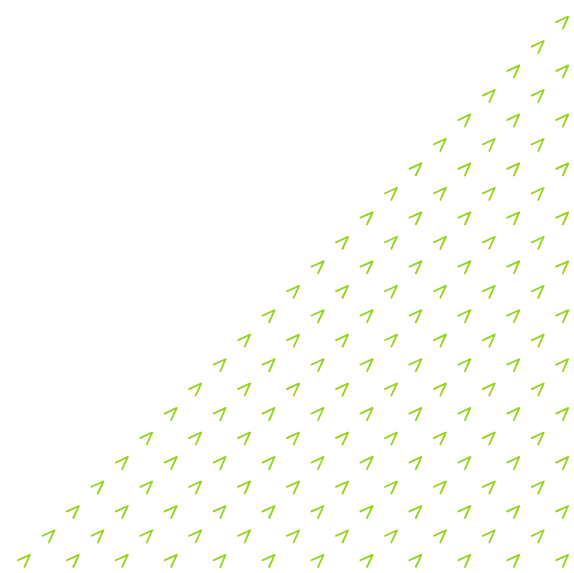
e-PSP Data Connection: Given the employment role of Pakenham South PSP we would encourage consideration be given to the growing needs of business to have access to fast data connection. A servicing report could include input from parties such as: Telstra for 5G; NBN, and optic fibre companies. It may be appropriate for the topic of digital infrastructure for Pakenham South to be considered with adjoining e-PSPs. The potential benefits of access to a regional data centre could be part of that consideration.

If you wish to discuss this feedback please contact [REDACTED], Project Manager, on [REDACTED]
[REDACTED]

Yours sincerely
[REDACTED]

Director, Facilitation Group
Invest Victoria

25 November 2020





MELBOURNE
SYDNEY

Partners
Mark M. Leibler AC
Henry D. Lanzer AM
Joseph Bornemazg AM
Leon Zwiler
Philip Chester
Roea A. Paterson
Stephen I. Sharp
Kenneth A. Gray
Kevin F. Frawley
Zaven Mandrossian
Jonathan M. Wenig
Paul Sokolowski
Paul Rubenstein
Peter M. Seidel
John Mitchell
Ben Mahoney
Jonathan Miner
John Mengol an
Carol ne Goulden
Matthew Lees
Genevieve Sexton
Jeremy Leibler
Nathan Briner
Jonathan Caplan
Justin Vaastira
Clint Hanning
Susanna Ford
Tyrone McCarthy
Teresa Ward
Christine Flier
Jeremy Lanzer
Bridget Little
Gia Cari
Jason van Grieken
Elyse Hilton
Jonathan Ornter
Stephen Lloyd
Scott Phillips
Gavin Hammerschlag

Consultant
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Special Counsel
Sam Dollard
Laila De Melo
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Emily Simmons

Senior Associates
Liam Thomson
Bridget Cowling
Brianna Youngson
Rebecca Zwiler
Kaitlin Lowdon
Lara O'Rourke
Stephane Campbell
Claire Stubbie
Briely Trotlope
Laura Cochrane
Dorian Henneron
Rachel Soth
Greg Judah
Ben Friis-O'Toole
Elly Bishop
Liam Cavelli
Raphael Leibler
Gabriel Salkal
Peter Scott
Mark Macrae
David Monteith
Elyse Moore
Rebekah French
Geisella D'Costa
Lisa Garzon
Vidushee Decora
Luke Jedynak
Emily Korla
Jenny Leongue
Chris Murphy
Gabriele Piesiewicz
Michael Repse
Anna Sapountsis
Jessica Thorne

26 November 2020

By E-mail
Cardinia Shire Council
(Strategic Growth Area Planning)
Amendment C265
PO Box 7
Pakenham VIC 3810

mail@cardinia.vic.gov.au

Your Ref L58237 & L58238

File No. 011913556

Dear Sir/ Madam

Submission on behalf of G & K O'Connor

Draft Pakenham South Employment Precinct Structure Plan (PSP)

Amendment C265, Cardinia Planning Scheme

- 1 We act for G&K O'Connor Pty Ltd.
- 2 Our client and its related entities own land at 910-940 Koo Wee Rup Road, Pakenham South directly south east of the PSP area (**O'Connor Site**).
- 3 G&K O'Connor is one of Australia's leading abattoirs. Its current operations represent over \$150 million in sunk capital invested on the O'Connor Site - comprising an abattoir, packing facilities, refrigerated storage and value adding facilities. Each year, G&K O'Connor invests millions of dollars into its business in order to continue to increase its capacity, efficiency and quality.
- 4 G&K O'Connor's biggest markets are currently in China and Japan with the company leading the Australian beef industry in terms of market access with accreditation to supply 41 countries.

- 5 Internationally, the G&K O'Connor brand is a respected wholesale brand targeting high value markets with current sales in excess of \$250 million annually.
- 6 Annually, G&K O'Connor purchases \$150 - \$180 million worth of cattle from the Gippsland region with this investment going direct to Victorian beef farmers.
- 7 Last year, G&K O'Connor spent \$27 million in payroll. G&K O'Connor is one of, if not the biggest, local employer in the Shire of Cardinia with over 400 staff. Its employees for the most part live in the Greater Pakenham area.

O'Connor Site Significance

- 8 From a planning perspective, the O'Connor Site's strategic significance is recognised in the Cardinia Planning Scheme. Special Use Zone 7 identifies the Site's importance to Victorian food security as the South East Food Production, Export and Employment Node. The purposes of Special Use Zone 7 comprise the following:
 - (a) To enhance the local, national and global market competitiveness of food production within the South-East region.
 - (b) To provide for an integrated supply chain enabling the use and development of the Site for co-location of food processing facilities.
 - (c) To provide for the continued use of land for abattoir purposes as well as the use and development of land for food production through the co-location of other uses.
 - (d) To protect the area from the encroachment of sensitive land uses.
 - (e) To promote food security and sustainable agriculture in the region.
- 9 The O'Connor Site's location is second to none in terms of its access to very high-quality beef from Gippsland and access to road transport. It is a 45 minute trip from the O'Connor Site to Port with almost no traffic lights.
- 10 Whilst the O'Connor Site is located on the edge of Melbourne's Urban Growth Boundary, the zoning of the site enables subdivision, development and use akin to the employment land (including the Pakenham South Employment PSP land) within Melbourne's urban area. As such, our client's site effectively bookends - and forms part of - the employment area known as the Southern Region State Significant Industrial Precinct. Further, the location of the O'Connor Site on the edge of the urban growth boundary ensures that the buffers associated with its future expansion are safeguarded from encroachment by sensitive uses.
- 11 In accordance with the provisions of Schedule 7 to the Special Use Zone, in October 2019, Cardinia Shire Council approved a Master Plan for the O'Connor Site providing for its staged subdivision and development as the South East Food Production, Export and Employment Node (Attachment 1). The approval of the Master Plan enables a permit to be granted for development, use and or subdivision of the O'Connor Site.
- 12 Once fully developed, the O'Connor Site will comprise a mixed-use agribusiness industrial cluster focused on production, distribution and sale of primarily premium meat products on which G&K O'Connor has built its reputation. It will also incorporate complementary service industries, and other associated rural industries leveraging local agriculture and produce.

- 13 Once the development of the O'Connor Site is completed in accordance with the Master Plan, it is expected that approximately 2,000 full time employees will be working at the Site.
- 14 G&K O'Connor is currently in discussions with a number of off-shore parties who have an interest in investing in the development of value-adding facilities onsite. G&K O'Connor are also negotiating with one of Australia's major food retailers.

Buffers

- 15 The draft PSP does not currently take into account the recommended separation distances associated with the approved Master Plan for the O'Connor Site.
- 16 These separation distances informed Council's approval of the Master Plan for the O'Connor Site last year. A copy of the assessment prepared by Peter J Ramsay & Associates (which informed Council's approval of the Master Plan) is Attachment 2 to this submission. Figure F1 provides a helpful summary of the buffer zones associated with the approved Master Plan.
- 17 The background assessments informing the preparation of the PSP should have regard to the buffer zones associated with the future development of the O'Connor Site as these zones underpin Council's approval of the Master Plan. This further assessment is necessary to ensure that sensitive uses within the PSP area do not encroach within the recommended separation distances associated with the approved Master Plan under SUZ7.

Traffic

- 18 The Traffic Impact Assessment Report prepared by Traffic Works Pty Ltd informing the preparation of the PSP does not take into account the traffic volumes that will be generated by the O'Connor Site once fully developed in accordance with the approved Master Plan.
- 19 The approved Master Plan is akin to an approved PSP or Development Plan under the Cardinia Planning Scheme in that it enables development to occur on the O'Connor Site in accordance with the approved Master Plan. The grant of a planning permit for subdivision, use and or development generally in accordance with the approved Master Plan is exempt from the notice and review requirements of the *Planning and Environment Act 1987* (Vic) when subject to the grant of a planning permit.
- 20 This deficiency in the information set out in the Traffic Impact Assessment underpinning the preparation of the PSP means that the likely traffic impacts associated with the PSP on the existing road networks including impact on both existing and proposed intersections and any required mitigating works have not been fully considered.
- 21 When the Master Plan traffic is taken into account, the modelled intersections would appear to provide insufficient capacity to handle the total traffic unless the bypass was in place. G&K O'Connor is therefore concerned that the PSP should not proceed without a commitment to the bypass.
- 22 To inform the preparation and approval of the Master Plan by Council, our client's traffic engineers, Traffix Group, identified traffic generation associated with the Master Plan as comprising the following:

Precinct	Use	Estimated Building Footprint	Peak Hour Traffic Generation Rate	Peak Hour Traffic Generation
Core	Abattoir	8,350 m ²	See Note 1	See Note 1
Entry	Retail (Primary Produce Sales)	6,000 m ²	2.7 per 100m ² (TDT Bulky Goods Rate)	162 vph
	Retail (Primary Produce Sales – Market Format)	12,000 m ²	2.7 per 100m ² (TDT Bulky Goods Rate)	324 vph
	Retail premises – manufacturing sales	17,600 m ²	1.0 per 100m ² (RTA Factory Rate)	176 vph
	Commercial Display	6,400 m ²	0.56 per 100m ² (TDT Business Park Rate)	36 vph
	R+D Precinct & Veterinary Centre	31,500 m ²	0.56 per 100m ² (TDT Business Park Rate)	176 vph
Transport	Transport Terminal	(3.1 hectare site)	-	(Note 2)
	Rural Store/Warehouse	10,000 m ²	0.5 per 100m ² (RTA Warehouse Rate)	50 vph
	Rural Store/Warehouse	36,400 m ²	0.5 per 100m ² (RTA Warehouse Rate)	182 vph
	Fuel Depot/Utilities	4,000 m ²	0.5 per 100m ² (RTA Warehouse Rate)	20 vph
Support/ Services	Warehouse/cold store	12,000 m ²	0.5 per 100m ² (RTA Warehouse Rate)	60 vph
	Rural industry – value-add processing, Service Industries	53,600 m ²	1.0 per 100m ² (RTA Factory Rate)	536 vph
	Rural Industry Expansion – value-add processing, Service Industries	25,000 m ²	1.0 per 100m ² (RTA Factory Rate)	250 vph
TOTAL				1,972 vph

Note 1 - The abattoir traffic within the Core Precinct is already counted within the 2019 base volumes and accordingly is not added separately here.

Note 2 - While the transport terminal will generate vehicle movements including heavy vehicle movements, these will generally be supporting movements associated with other uses on the site and accordingly have not been counted separately so as to avoid double-counting.

23 These volumes are in addition to the traffic associated with the existing operations which Traffix Group describes as follows (based on seven-day tube counts conducted in March 2019 on Koo Wee Rup Road and the existing O'Connor Site access):

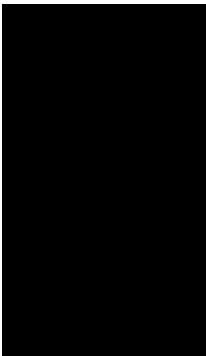
- The current AM Site peak occurs between 5:00am and 6:00am, at which time 177 vehicle movements were recorded on the site access, including 168 inbound movements and 9 outbound movements.
- The current AM “commuter” peak occurs between 7:00am and 8:00am, at which time only 8 vehicle movements were recorded on the site access, including 5 inbound movements and 3 outbound movements.
- The current PM “site” and “commuter” peaks coincide, occurring at 4:00pm to 5:00pm, at which time 146 vehicle movements were recorded on the site access, including 14 inbound and 132 outbound movements.
- On Koo Wee Rup Road (north of the O'Connor Site access), the 2019 surveyed northbound traffic volumes were 170 vph and 223 vph higher than the MRPV

2016 values during the AM and PM peaks respectively. On Koo Wee Rup Road north of the O'Connor Site access, the 2019 surveyed southbound traffic volumes were 88 vph and 180 vph higher than the MRPV 2016 values during the AM and PM peaks respectively.

- (e) The overall commercial vehicle (CV) proportion was roughly 13% on both Koo Wee Rup Road and the O'Connor Site access. This figure does not distinguish between peak hours and other times and is an average across the full survey period.
- 24 In order to determine the likely traffic impacts of the PSP on the existing road networks including impact on both existing and proposed intersections and any required mitigating works, it is necessary for the Traffic Impact Assessment Report underpinning the PSP to take into account the traffic that will be generated under the approved Master Plan for the O'Connor Site.
- 25 Our client's traffic consultant, Traffix Group, is available to meet with Council's traffic engineering consultants to share relevant information associated with the approved Master Plan for the O'Connor Site.
- 26 We hope that the deficiencies in the assessments underpinning the PSP can be sensibly remedied before the PSP proceeds to Panels.



Please contact me if you have any queries or comments in relation to this matter.

Yours sincerely
Arnold Bloch Leibler



Partner

1 October 2019


Schutz consulting


Dear Madam,

Application No.: Masterplan Approval
Property No.: 4465352900
Address: 940 Koo Wee Rup, Pakenham
Proposal: Approval of South East Food Production, Export and Employment Node Masterplan

Please find enclosed your copy of the approved endorsed Master Plan.

If you have any further queries regarding this matter, please contact Council's Development Services department on **5943 4263** or mail@cardinia.vic.gov.au

Yours faithfully,


Senior Statutory Planner

NOTES:

- The location, configuration and suggested land uses of each of the precincts may be varied subject to the findings of further detailed surveys being undertaken at the site. These surveys may include, but are not limited to, Targeted Surveys for Growing Grass Frogs and Dwarf Galaxias or detailed odour assessments of present and future uses.
- Planning applications for buildings and works within the entry precinct or along the northern interface with the South East Water Treatment Plant, must be accompanied by a detailed odour assessment to the satisfaction of the Responsible Authority.
- Vegetated landscape buffer along all boundaries to be 5 metres wide.
- No development within 30 metres of the top of bank of Deep Creek unless otherwise agreed with Melbourne Water.
- The internal local road network to be constructed to Cardinia Shire standards for local industrial roads unless otherwise agreed with Council.
- All buildings and works must be undertaken in accordance with the approved design guidelines.

TOTAL SITE AREA = 118.72ha
INDICATIVE PRECINCT LAND USES:

CORE PRECINCT

- O'Connor Australia Production Precinct (current)
- Future expansion area

ENTRY PRECINCT

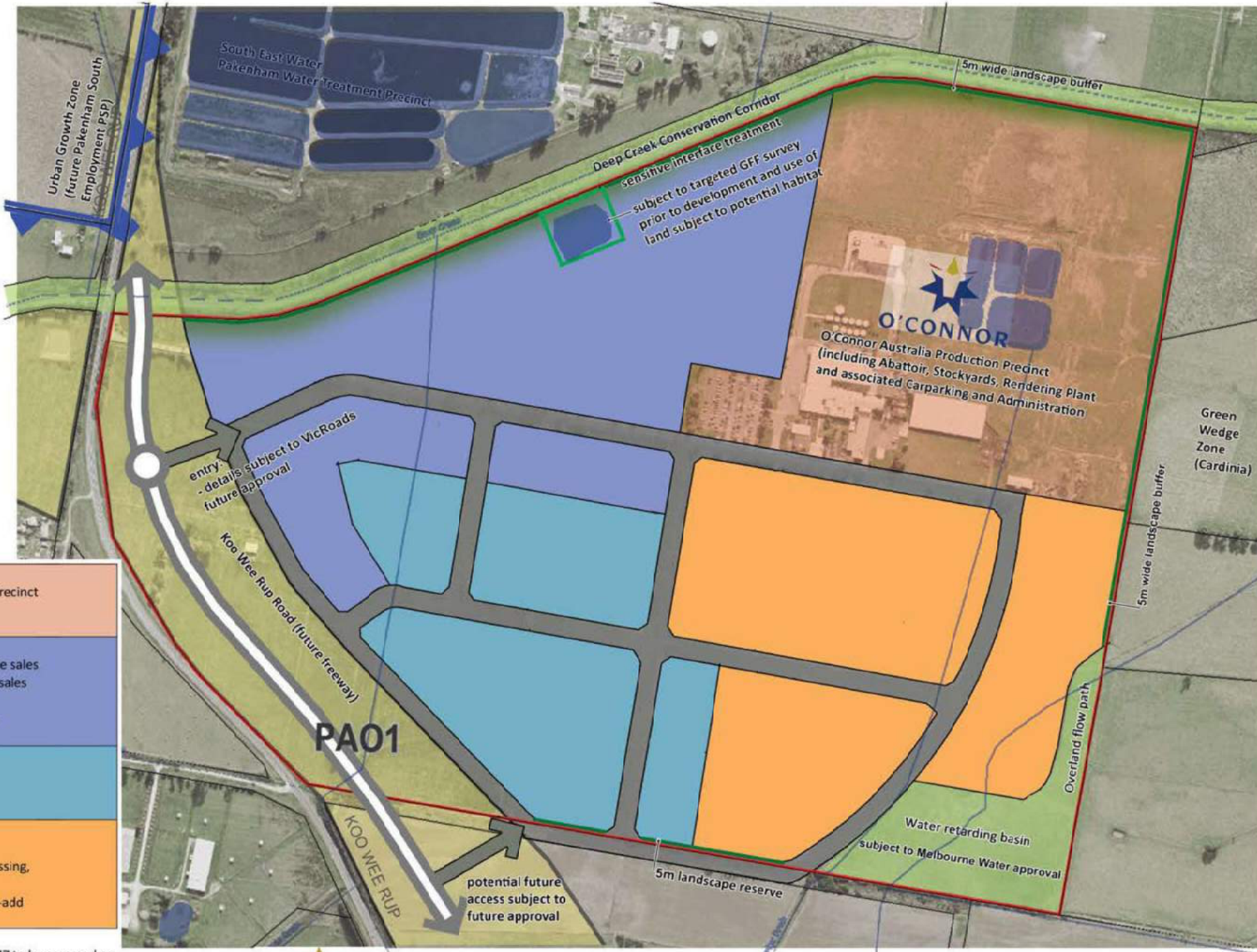
- Retail premises - primary produce sales
- Retail premises - manufacturing sales
- Commercial display area
- R+D precinct - Veterinary centre
- Rural store/warehouse

TRANSPORT PRECINCT

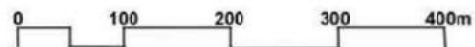
- Transport terminal
- Rural store/warehouse
- Fuel depot/utilities

SUPPORT/SERVICES PRECINCT

- Warehouse/cold store
- Rural industry - Value-add processing, Service industries
- Rural industry expansion - Value-add processing, Service industries



Note - Other uses permissible under SUZ7 to be assessed on merit against the relevant provisions of the Planning Scheme.



Masterplan (rev 8)

South East Food Production, Export and Employment Node

20 September 2019

Warren Lee Urban Design Pty Ltd
10434078112 wlee@wulud.com.au



1 October 2019

[REDACTED]
Schutz consulting
[REDACTED]

Dear Madam,

Application No.: Masterplan Approval
Property No.: 4465352900
Address: 940 Koo Wee Rup, Pakenham
Proposal: Approval of South East Food Production, Export and Employment Node Masterplan

Please find enclosed your copy of the approved endorsed Master Plan.

If you have any further queries regarding this matter, please contact Council's Development Services department on **5943 4263** or mail@cardinia.vic.gov.au

Yours faithfully,

[REDACTED]

Senior Statutory Planner

NOTES:

- The location, configuration and suggested land uses of each of the precincts may be varied subject to the findings of further detailed surveys being undertaken at the site. These surveys may include, but are not limited to, Targeted Surveys for Growling Grass Frogs and Dwarf Galaxias or detailed odour assessments of present and future uses.
- Planning applications for buildings and works within the entry precinct or along the northern interface with the South East Water Treatment Plant, must be accompanied by a detailed odour assessment to the satisfaction of the Responsible Authority.
- Vegetated landscape buffer along all boundaries to be 5 metres wide.
- No development within 30 metres of the top of bank of Deep Creek unless otherwise agreed with Melbourne Water.
- The internal local road network to be constructed to Cardinia Shire standards for local industrial roads unless otherwise agreed with Council.
- All buildings and works must be undertaken in accordance with the approved design guidelines.

TOTAL SITE AREA = 118.72ha

INDICATIVE PRECINCT LAND USES:

CORE PRECINCT

- O'Connor Australia Production Precinct (current)
- Future expansion area

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- Retail premises - primary produce sales
- Retail premises - manufacturing sales
- Commercial display area
- R+D precinct - Veterinary centre
- Rural store/warehouse

TRANSPORT PRECINCT

- Transport terminal
- Rural store/warehouse
- Fuel depot/utilities

SUPPORT/SERVICES PRECINCT

- Warehouse/cold store
- Rural industry - Value-add processing, Service industries
- Rural industry expansion - Value-add processing, Service industries

Note – Other uses permissible under SUZ7 to be assessed on merit against the relevant provisions of the Planning Scheme.

0 100 200 300 400m

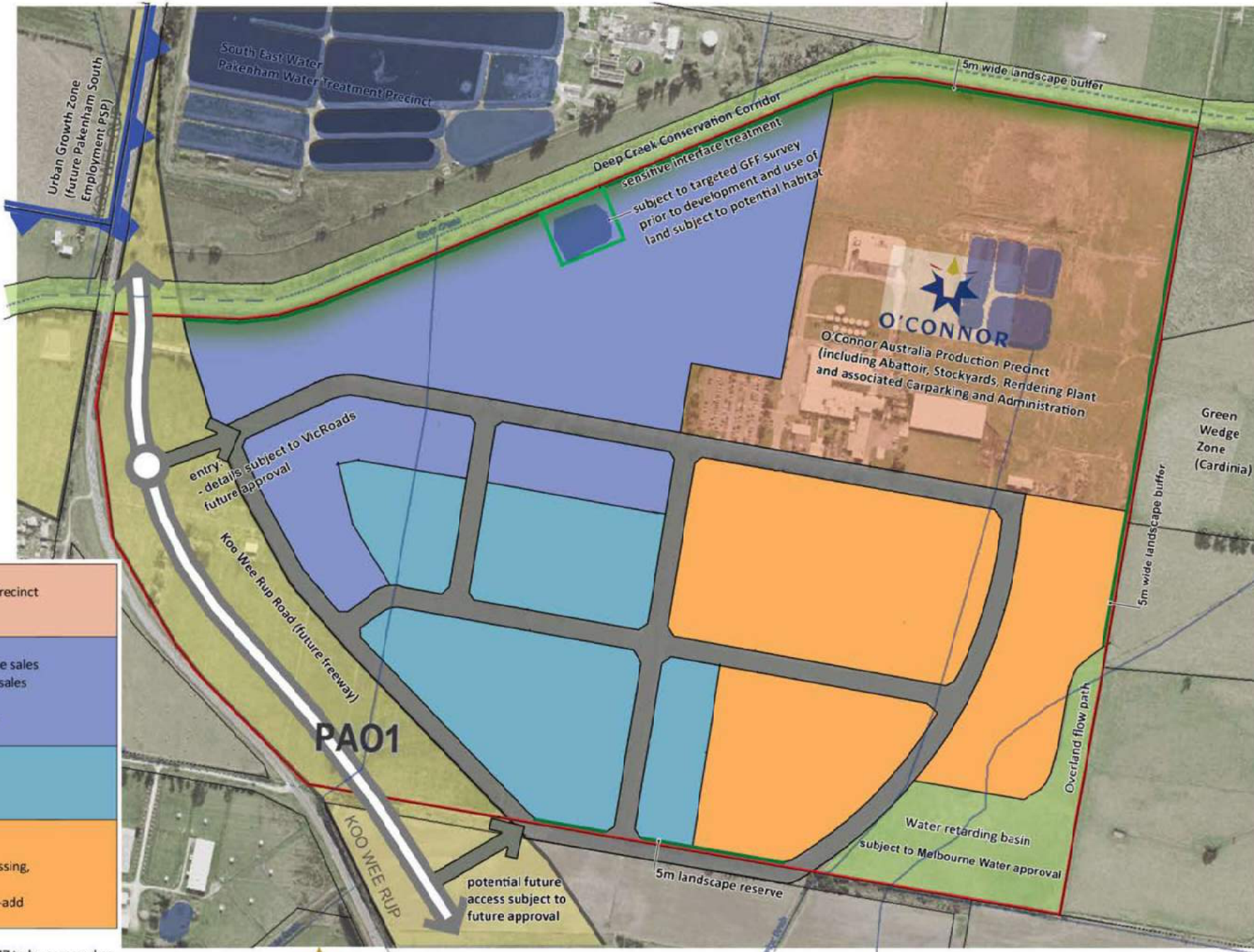


Masterplan (rev 8)

South East Food Production, Export and Employment Node

20 September 2019

Warren Lee Urban Design Pty Ltd
10434078112 wlee@wulud.com.au



Cardinia Shire Council (Strategic Growth Area Planning)
Amendment C265
PO Box 7
PAKENHAM VIC 3810

26 November 2020

Dear Sir/Madam

AMENDMENT C265 PAKENHAM SOUTH EMPLOYMENT PRECINCT STRUCTURE PLAN

I own [REDACTED] of the proposed amendment C265 Pakenham South Employment Precinct Structure Plan. I have some concerns regarding impacts of the PSP on my property that I wish to discuss with Council to resolve.

I am concerned that the combination of the PSP development with the future freeway bypass will [REDACTED], and unviable for either farming or future land development.

I believe that these issues may be resolved by

1. Ensuring the PSP requires road access to my property;
2. Council applying to extend the Urban Growth Boundary to incorporate my property;
3. Council subsequently incorporating my property within the PSP, possibly within a future PSP review.

I request a meeting with Council to discuss the above issues, to establish a pathway to resolve them.

Please also see enclosed a detailed response completed by Planning Central on my behalf, which further details the issues.

Please call me on [REDACTED] to arrange a time to meet to discuss my concerns.

Yours sincerely

[REDACTED]

Encl.

26 November 2020

Planning Department
Cardinia Shire Council
P O Box 7
PAKENHAM VIC 3810

mail@cardinia.vic.gov.au

Dear Sir / Madam



**Planning
Central**

LAND USE AND DEVELOPMENT

ACN 161 565 902
ABN 68 625 299 632

PO Box 2301
Oakleigh, Vic 3166

**RE: CARDINIA AMENDMENT C265 - SUBMISSION
PAKENHAM SOUTH EMPLOYMENT PSP**

Planning Central Pty Ltd acts on behalf of [REDACTED] who has an interest in land at [REDACTED].

A copy of the Certificate of Title is presented at **Appendix A**.

In short, the land is:

- affected by the Cardinia Planning Scheme.

The location of the site is depicted below.

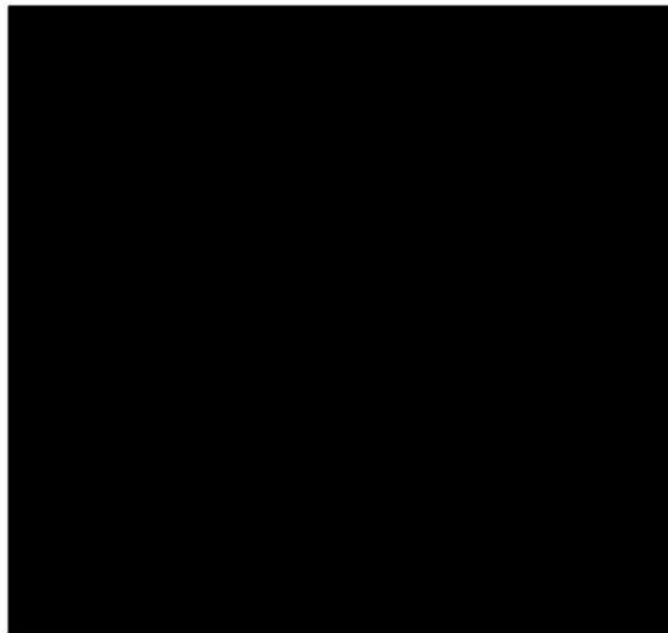


Figure 1 - Location Plan
Source : LASSI



A notated aerial photo of the site is depicted below.

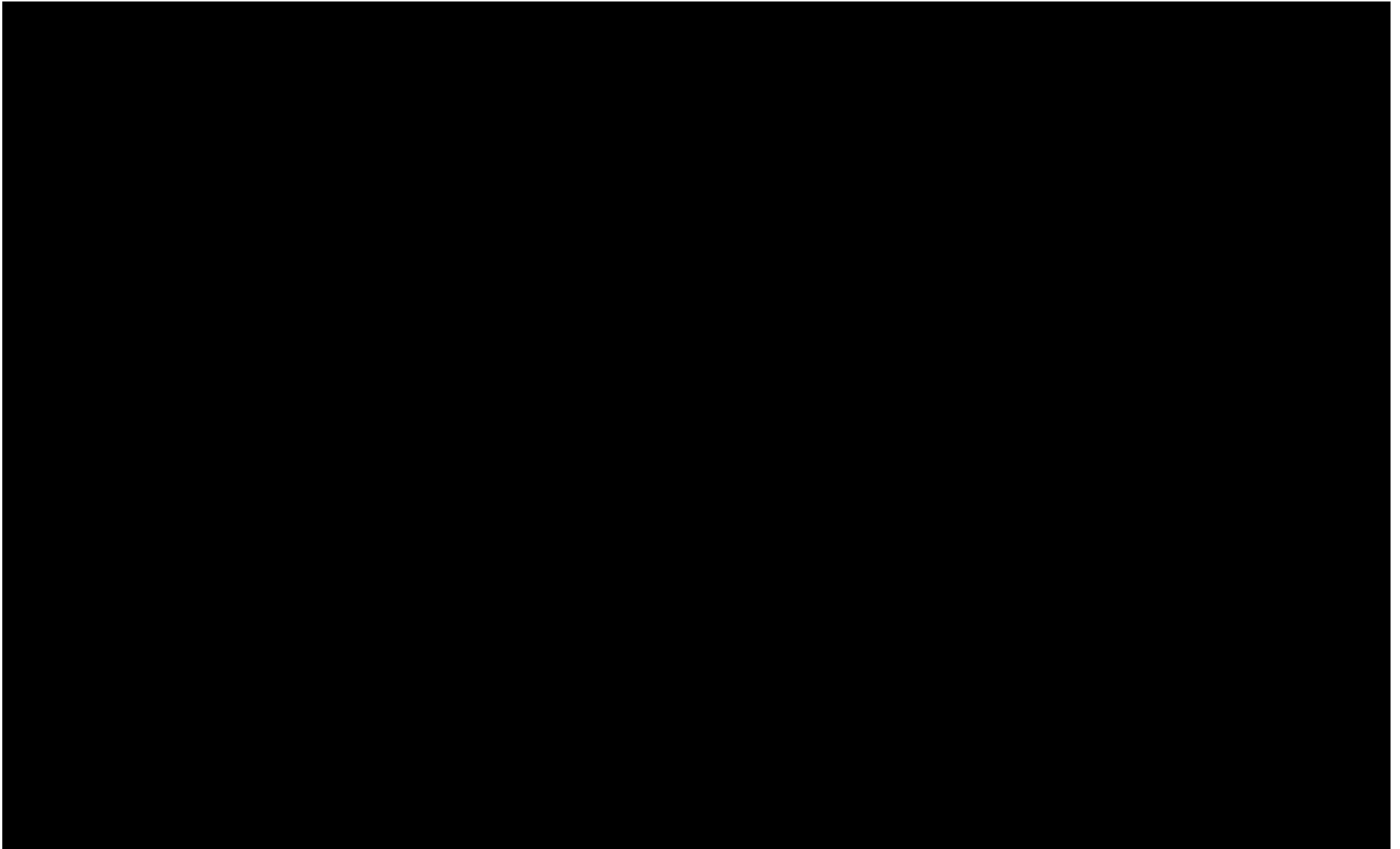


Figure 2 - Notated Aerial Photo
Source: LASSI
Not to Scale

The Pakenham South Employment PSP has been under preparation for the past three (3) years.

This PSP is now on public exhibition via Planning Scheme Amendment C265 to the Cardinia Planning Scheme.

Our client has now reviewed this PSP and Amendment and wishes to raise the following points.

A copy of the proposed PSP Future Urban Structure Plan is depicted at Figure 3 below.

In short, this reveals that:

- [REDACTED]
- [REDACTED]
- under the zone and PSP Future Urban Structure Plan, the balance of the land will continue to be designated for Farming.

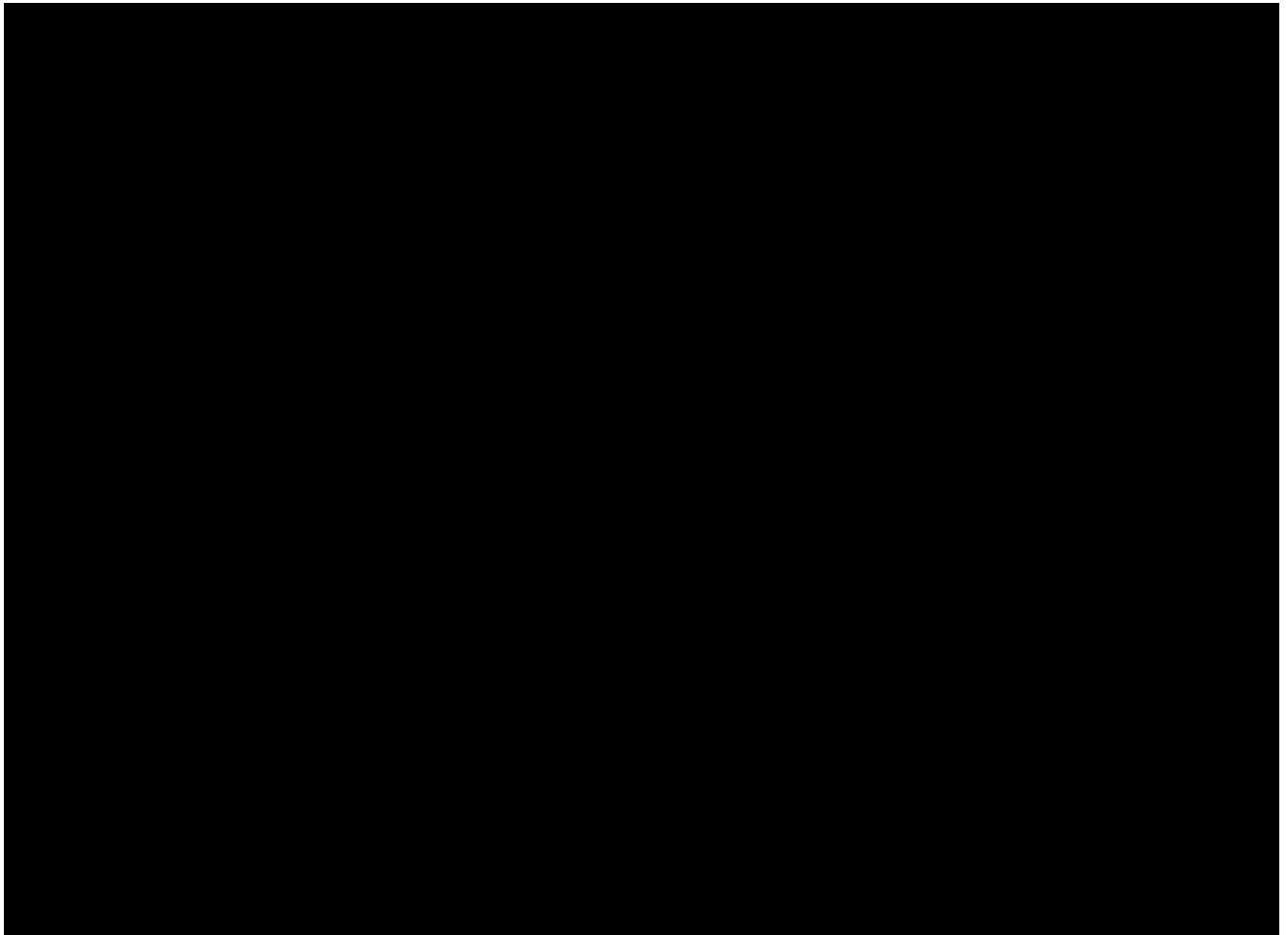



Figure 3 - Marked Up PSP (Future Urban Structure Plan)
Source: Pakenham South Employment PSP – Oct 2020
Not to Scale

Based on the above, our client remains concerned about the:

- future built form within the PSP area and the relationship / potential impacts on his land.
- need to ensure that appropriate road connections are available to his land via the PSP area, to facilitate orderly access if and when his land is rezoned / developed.
- the implications of the proposed future By-Pass Road on the existing and future use of his land.

It is submitted that retaining the land as currently proposed is questionable from a legal perspective (ie creating land locked parcels), unviable for an isolated farming activity and would be better utilised for urban purposes.

Accordingly, we would like Cardinia Shire Council to consider inclusion of the land in the UGB, PSP and for the land to be more appropriately zoned.



Based on the matters raised above, we request a meeting with Council and / or VicRoads to discuss and explore opportunities available to address our clients concerns.

We trust that this submission is favourably received and we look forward to an opportunity to engage further on the matters raised.

Should you wish to discuss any aspect, do not hesitate to contact the undersigned directly on [REDACTED]
[REDACTED].

Yours faithfully,



Planning Central Pty Ltd

Appendix A

Certificate of Title

26 November 2020

Kiera Lee
Cardinia Shire Council

Proposal: Planning scheme amendments

Project: amdt C265card - Pakenham South Employment Precinct Structure Plan

Melbourne Water reference: MWA-1188458

Date referred: 09/10/2020

Closing Date: 26/11/2020

Thank you for providing Melbourne Water with the opportunity to provide comment on the exhibited Pakenham South Employment Precinct Structure Plan, Amendment C265card to the Cardinia Planning Scheme.

Melbourne Water can now provide our in-principle support to the proposed Amendment C265card to the Cardinia Planning Scheme, which will rezone the land as described in the relevant amendment documentation. Melbourne Water notes that the information provided to date is preliminary in nature and that more detailed investigation work (compliant with all relevant authorities standards and requirements) will need to occur prior to implementation of any of the outcomes proposed as part of this amendment and the supporting documentation.

Our review of the exhibited PSP and associated documents has aimed to ensure they reflect our requirements with respect to stormwater drainage, flood management and river health in accordance with our functions as Regional Drainage, Floodplain Management and Waterway Management Authority under the Water Act 1989. Melbourne Water is generally satisfied with the exhibited PSP, however, we do have comments regarding the drainage servicing requirements for this precinct and some of the interface outcomes proposed. Below are our comments which outline the sections where alterations to the documents are required, and also provides general comments regarding the some of the proposed outcomes:

Drainage Services Strategy

- Melbourne Water has worked closely with Cardinia Shire Council in developing an appropriate drainage servicing strategy for this precinct, which will also be reflected in the updated version of the Deep Creek South Development Services Scheme.
- Table 3 Water Infrastructure identifies the area of Asset WL1 as approximately 7.75 ha, however, the area of the public acquisition overlay (PAO) for this asset is approximately 13.8 ha. Melbourne Water requests that the land-take figure for Asset WL1 is updated to reflect the area of the PAO included with this amendment.
- Plan 11 Note - Could the reference to "truck drainage lines" be updated to "trunk drainage lines" or "main drainage lines"

Uncredited Open Space - Transmission Easement Towers

- The future urban structure identifies an area of uncredited open space to accommodate the most eastern transmission towers, along the boundary with Koo Wee Rup Road. In many of the plans within the PSP documentation, this area of uncredited open space is also identified for drainage purposes. Melbourne Water would not accept the ownership or management responsibilities for this land and suggests that the legend be updated to not specifically reference this area for drainage purposes.

General

- R47 - Stormwater conveyance and treatment must be designed in accordance with the relevant Scheme and/or Drainage Strategy, to the satisfaction of Melbourne Water. The wetland identified as WL1 in Plan 11 is located outside of the precinct and an Incorporated Plan Overlay Schedule 2 – Pakenham South Employment Precinct Structure Plan applies to this land to give affect to the PSP.
 - Melbourne Water requests that the reference to "scheme" be updated to "Development Services Scheme".
- Plan 12 Utilities details a Sewage Pump Station in the south-east corner of the precinct and appears to proposed connections to the wetland (WL1) to the south of the precinct. Melbourne Water requests further guidance regarding the intent of the sewerage network in this section of the precinct and confirm of the proposed siting of any emergency relief structure (ERS) from the proposed Sewage Pumps Station.

Should you require any further information please don't hesitate to contact myself on

[REDACTED]

Kind Regards

[REDACTED]

Precinct Structure Planning Coordinator
Catchment Strategies and Services, Development Services

26 November 2020

Cardinia Shire Council (Strategic Growth Area Planning)
c/- Keira Lee
Coordinator Growth Area Planning
PO Box 7
Pakenham VIC 3810

**Submission to Pakenham South Employment Precinct Structure Plan
Amendment C265 – Cardinia Shire Planning Scheme**

Thank you for the opportunity to make a submission in relation to the Amendment C265 to the Cardinia Shire Planning Scheme and specifically the draft *Pakenham South Employment Precinct Structure Plan (PSP)* and accompanying planning scheme provisions.

Insight Planning Consultants, on behalf of Jane Property Group, are acting for [REDACTED], [REDACTED] [REDACTED] are pleased to provide the following submission in response to Amendment C265 to the Cardinia Shire Planning Scheme.

In general terms, our clients support the approval of the Pakenham South Employment PSP and the Amendment, including the 'vision', 'objectives' and 'land use distribution', however there are some concerns regarding specific 'guidelines' and 'requirements' that are outlined in this submission that we seek to be addressed.

Importantly, we believe that our requested changes will further improve the PSP's ability to guide change, respond to evolving markets, provide flexibility in design and most importantly, encourage early investment in this precinct.

This submission relates to the 'Exhibited Documents' that are available on Council's website and seeks to outline each issue of concern and a requested change that we believe will enhance the deliverability of the PSP.

This submission has been structured to identify and explain our key issues with the PSP and then to provide a table summary of our requested changes to each of these key issues. In preparing this submission we have been working collaboratively with Charlton Degg Land Development Consultants and Traffix Group to support our response, and as such a Concept Plan and Traffic Engineering Assessment have been included in Appendix 1 and 2 respectively.

I trust the contents of this submission are clear however, we look forward to working closely with the Cardinia Shire Council to progress the approval of the Pakenham South Employment Precinct Structure Plan.

Please contact me on [REDACTED] or [REDACTED] if you have any queries.

Yours sincerely
Jason Black

1. Subject Site

The site is located at [REDACTED] in Pakenham and is identified as [REDACTED] within the PSP area. [REDACTED]

[REDACTED]
[REDACTED].

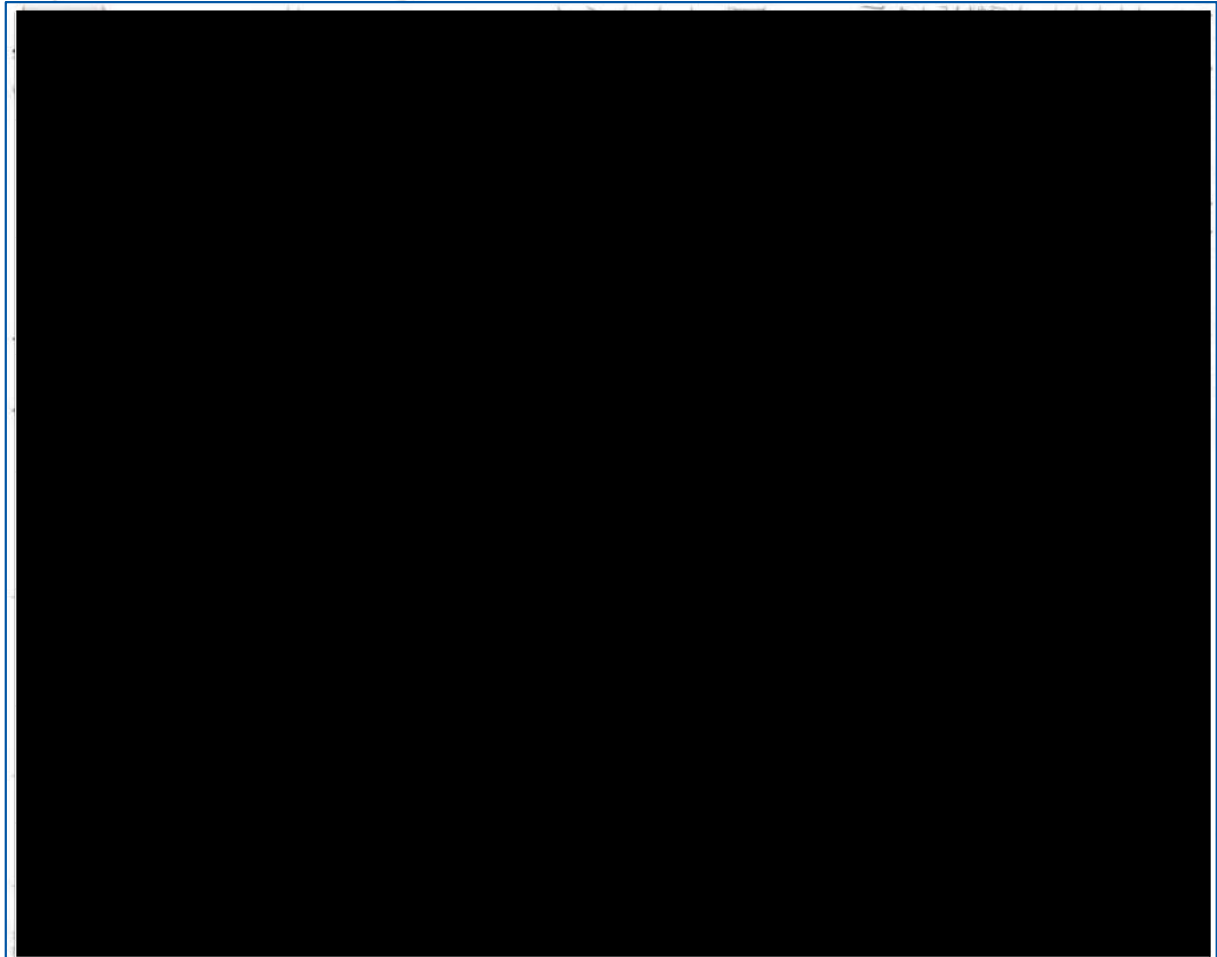


Figure 1 – Location of Subject Site as shown on Plan 4 – Future Urban Structure Plan (Pakenham South Employment Precinct)

2. Submission

The following submission is provided to assist in ensuring that the vision for the site can be achieved, and development can commence as soon as practical.

Key Issues

While our client generally supports the approval of the Amendment, there are a number of key issues that we have identified in the Amendment documents, in particular the PSP, that relate to the site at [REDACTED], [REDACTED] [REDACTED]. Many of these issues are intertwined, and it would be difficult to change just one without impacting the others, such as the proposed road network, the heritage place and the convenience centre. In supporting the PSP moving forward, our client is looking to develop the land as soon as possible. Our client has prepared a concept plan for the subdivision of [REDACTED] however in order to achieve their preferred development outcome, the following requested changes to the PSP need to be made. The concept plan is provided at Appendix 1 of this submission.

Road Network

The proposed road network shown in the PSP identifies a north-south local access street to the east of the Local Convenience Centre (LCC). There is currently no direct road access to [REDACTED] from Greenhills Road. An extract of Plan 4 identifying the north-south road is shown below:



Figure 2 – North-south local access street Plan 4 – Future Urban Structure Plan (Pakenham South Employment Precinct)

The location of the local access street to the east of the LCC and heritage place HO14 should be moved from Property 2 to the eastern boundary of Property 1. This would provide [REDACTED] with direct access from Greenhills Road.

The Traffic Engineering Assessment (TEA) undertaken by Traffix Group provides a detailed traffic engineering critique of the exhibited Draft Pakenham South Employment PSP with particular regard to the road network, access connections and pedestrian and cycle paths identified for [REDACTED] [REDACTED]. This report is provided in Appendix 2 of this submission.

The TEA identifies a number of inconsistencies and issues within the PSP with relation to the proposed road network, specifically within Property 1. With respect to the relocation of the north-south local access street to the eastern boundary of Property 1, the TEA states, *“a better overall interim and ultimate outcome would be achieved if this road were instead relocated along the eastern boundary of the subject site (Property 1)”*.

Relocating the road would mean that it was approximately half way between McGregor Road to the west and the future industrial connector road identified to the east. It would also be sufficiently offset from the McGregor Road/Greenhills Road intersection to ensure that there is no compromise to the ultimate design/construction of each intersection. Additionally, on the expectation that development of Property 1 is to commence with the planning permit process immediately following completion of the PSP process, the relocation of the road would mean that there would be no need to potentially obtain temporary vehicle access to Greenhills Road as part of the development or rely on connecting roads being provided within the adjacent property in order to access the site.

Refer to Attachment 3 for the Concept Plan for [REDACTED]

Requested Changes: Amend Plan 4 and subsequent plans to relocate the north-south local access street from the eastern side of the LCC on Property 2 to the eastern boundary of Property 1.

Heritage

Section 3.1.3 – Heritage of the PSP identifies a 30m setback to the heritage place HO14 which unreasonably impacts [REDACTED]. We believe the intent of the relevant provisions can be achieved, without the requirement for a buffer on the adjoining land.

Requirement 9

‘Before the commencement of works or any subdivision on land within or adjacent to the heritage place, the heritage place must be appropriately secured against damage as a result of works, deterioration, and the effects of weather, trespassing or vandalism, to the satisfaction of the responsible authority.’

This requirement prevents the commencement of works on [REDACTED] until Property 2 appropriately secures the heritage place.

This requirement needs to be removed, as it is restricting the potential development of [REDACTED] beyond our client’s reasonable control.

Requirement 12

'Building setbacks of no less than 30 metres must be provided from the entire western boundary of the HO14 to ensure that development does not adversely affect the significance of heritage place.'

A 30m buffer from the heritage place is considered excessive, particularly as this buffer is proposed along the entire western boundary of the HO14. The trees designated to be retained do not require a 30m buffer to be appropriately protected, and that standard tree protection measures (TPZs etc) would be sufficient to adequately maintain the trees.

Relocating the north-south key local access street to the western side of the heritage place would remove the need for a buffer, as the road would act as an appropriate buffer to future industrial development on [REDACTED]. The location of a road along the western boundary of HO14 is also recommended in Guideline G13 of the PSP.

Illustration 1 – Building Setback from Heritage Overlay should be removed from the PSP.

Guideline 13

'Landscaping and road reserves are encouraged to be located within the 30 metre setback from the western boundary of HO14. The storage of goods and materials within the setback should not adversely affect the amenity of the heritage place in HO14.'

With the removal of the 30m setback, G13 becomes irrelevant.

Requested Change: Remove Requirement 9, Requirement 12, Guideline 13 and Illustration 1 from the PSP, as these relate to the heritage buffer to be removed.

Employment

Section 3.2.1 - Employment of the PSP includes a number of built form requirements and guidelines that appear excessive and irrelevant to the future subdivision of land within the precinct. These requirements would be better suited within separate Industrial Design Guidelines that are included as an Appendix to the PSP.

Guideline 16

'Uses with larger buildings that provide a sense of containment to the street should be located to the periphery of the precinct, particularly along Greenhills Road to ensure a defined and robust edge to the precinct.'

Guideline 17

'Subdivision should create gateway sites capable of accommodating larger buildings that provide visual markers at key entry locations to the precinct.'

Guidelines G16 and G17 indicate the need for larger lots on the periphery of the PSP area, particularly along Greenhills Road, but there is no guidance on how large these lots should be. The guidelines should therefore be removed from the PSP.

Extent of built form requirements and guidelines in Section 3.2.1 of the PSP is excessive and complicates the PSP. It is suggested that these are usually contained within Industrial Design Guidelines or similar, as opposed to having these within the PSP itself. The format of the requirements and guidelines should be revised to make it clearer which relate to subdivision and/or development permit applications.

Requested Changes: Remove Guideline 16 and Guideline 17 specifically. Built form requirements and guidelines within Section 3.2.1 of the PSP should be revised, and incorporated into separate Industrial Design Guidelines or as an appendix to the PSP if necessary.

Local Convenience Centre

Section 3.2.2 – Local Convenience Centre of the PSP identifies that a Local Convenience Centre (LCC) is to be located on the eastern side of the heritage place HO14.

The PSP states that *“it is envisaged that workers will be able to: access the convenience centre from the north south connector and local access street through pedestrian focused environs”*. This in itself is an inaccurate statement as there are no connector streets shown adjacent to the LCC on Plan 9 – Road Network. This plan instead shows a north-south local access street to the east of the LCC and the heritage place HO14.

Requirement 15

‘The local convenience centre must be oriented towards Greenhills Road and the north south road, with

- *Buildings that have zero setback from the street addressing the Greenhills Road frontage;*
- *Vehicle access must be provided from the north south road only. Direct vehicle access from Greenhills Road is not permitted;*
- *Access into the site is to be provided from a left in left out only intersection with Greenhills Road;*
- *Centralised rear parking for commercial tenancies at the rear of buildings adjacent to the public open space; and*
- *An appropriate relationship and interface with the surrounding uses*

To the satisfaction of the responsible authority.’

Guideline 28

‘Two storey built form should be used to emphasise the corner of Greenhills Road and the north south road to signify entry to the local convenience centre’.

As previously discussed, the proposed north-south local access street should be relocated to the western side of the HO14. Access to the LCC could be obtained through the heritage place and the existing access from Greenhills Road.

If the centre’s public realm is to be a pedestrian priority area as described in 3.2.2, this could be better accomplished through the relocation of the key local access street to the western side of the heritage

place, and promotion of shared path connections along the eastern side instead, encouraging workers to walk or cycle to the LCC instead of drive – it is less pleasant walking along the side of a major road, as opposed to within the open space surrounding the heritage place.

Illustration 2 – Local Convenience Centre Concept Plan should be amended to show the north-south street on the western side of the heritage place. Access to the LCC would be through the heritage place via the existing access from Greenhills Road. Open space with shared path could be extended to the east of the heritage place.

Once the north-south local access street is relocated to the eastern boundary of [REDACTED] G28 is no longer relevant, as there would be no intersection. Additionally, the requirement for double storey built form is echoed in G29.

Requested Changes: Remove Requirement 15 and Guideline 28 from the PSP, as these correlate to the north-south local access street. Amend Illustration 2 to show the local access street relocated to the western side of HO14.

Native Vegetation

Plan 8 – Native Vegetation, includes a note that, *“Native Vegetation requirements are specified at Clause 52.17 and its schedule in this planning scheme. This plan must be read in conjunction with those provisions”*.

The schedule to Clause 52.17 states, in relation to Land shown as Urban growth Zone 6 for the Pakenham South Employment Precinct, *“All native vegetation removal, destruction or lopping of which is required for any development that is subject to and carried out in accordance with ‘Final approval for urban development in three growth corridors under the Melbourne urban growth program strategic assessment, 5 September 2013’ made pursuant to Section 146B of the Environment Protection and Biodiversity Conservation Act 1999 (Cth). This does not apply to native vegetation or scattered trees identified as to be retained in a precinct structure plan incorporated in this scheme”*.

Currently, Plan 8 – Native Vegetation Extent identifies the extent of Native Vegetation, however it does not specify whether this is to be retained or removed. The PSP does indicate that there are no conservation areas identified within the precinct, therefore it can be presumed that no vegetation is proposed to be retained within the precinct.

As such, Plan 8 – Native Vegetation Extent should be amended to identify that all native vegetation is to be removed.

Requested Changes: Amend Plan 8 to identify that all native vegetation is to be removed.

Transport and Movement

There are a number of requirements and guidelines within Section 3.4 – Transport and Movement of the PSP that provide specific obligations that unreasonably constrain future subdivision of the precinct, particularly in relation to transport and movement through the precinct.

Guideline 36

'Street block lengths should not exceed 200 metres to ensure a safe, permeable and low speed environment for pedestrians, cyclists and vehicles is achieved.'

The requirement for street block lengths not exceeding 200 metres does not translate to an industrial context and is not appropriate, given the larger lot sizes.

Broader guidelines relating to street permeability should be incorporated, as opposed to the specific requirements in the PSP (eg. R37, R40, G36). Industrial street networks are very different to residential subdivisions.

Requested Changes: Remove Guideline 36 from the PSP, as this is not appropriate in an industrial context. Review Requirement 37 and Requirement 40 to implement broader targets for street permeability.

Servicing

Plan 12 – Utilities of the PSP identifies the location of existing and future services within the PSP area. There are inconsistencies in this plan when compared to other plans prepared by the relevant authorities.

The proposed permanent sewer pump station (SPS) shown on Plan 12 on the south-east corner of Greenhills Road and McGregor Road is inconsistent with South East Waters Sewer Strategy Plan, which does not require a SPS at this location. Plan 12 should therefore be amended to remove the permanent sewer pump station as this is not required.

The proposed drainage reserve located at the north-west corner of [REDACTED] and the main drainage alignment through the site is inconsistent with Melbourne Waters Deep Creek South DSS Map, which does not specify a designated overland flow path. Plan 12 should therefore be reviewed to determine whether these drainage assets are accurately located and required.

Requested Changes: Amend Plan 12 – Utilities of the PSP to remove the proposed permanent sewer pump station and review whether drainage assets within Property 1 are accurately located and required.

Precinct Infrastructure

Plan 13 and Table 4 – Precinct Infrastructure list the items of the Pakenham South Employment ICP and other infrastructure to be delivered by the local council or State Government to meet the needs of the proposed development within the precinct.

Two items listed in Table 4 require review, as below:

PROJECT CATEGORY	ICP PROJECT NUMBER	TITLE	PROJECT DESCRIPTION	LEAD AGENCY	COMPONENT INCLUDED IN ICP			TIMING
					Ultimate land	Interim construction	Ultimate construction	
Road Projects								
Road	RD-02	Greenhills Road from Commercial Drive to Healesville-Koo Wee Rup Road (between intersection extents)	Construction of second carriageway within 34 metre road reserve south of existing road reserve, between Commercial Drive and Healesville-Koo Wee Rup Road	Cardinia Shire Council	Yes	N/A	Yes	S-M
Intersection Projects								
Intersection	IN-01	Greenhills Road / Healesville-Koo Wee Rup Road intersection	Provision of land (interim treatment) and construction of intersection (interim treatment). Major Roads Project Victoria delivering whole of intersection excluding additional lane on Greenhills Road and south west left turn slip lane)	Cardinia Shire Council	Yes	Yes	N/A	S-M

Figure 3 – Extract of Table 4 – Precinct Infrastructure (Pakenham South Employment Precinct)

Item RD02 (Greenhills Road from Commercial Drive to Healesville-Koo Wee Rup Road – between intersection extents) needs to be reviewed. In particular, why the ultimate construction is included in the ICP.

Item IN01 (Greenhills Road / Healesville-Koo Wee Rup Road Intersection) needs to be reviewed. In particular, the project description should be reviewed as it indicates that Major Road Project Victoria is delivering the whole of the intersection excluding the additional land on Greenhills Road and the south west left turn slip lane.

Additionally, whether Culverts (Greenhills Road) should be included in the ICP (if required) should also be considered or whether sufficient culvert funding is committed from the South East Business Park to extend culverts beneath the upgrade works proposed by the Pakenham South Precinct Infrastructure Tables.

It should also be noted that any requirement for a future roundabout on McGregor Road as a direct result of the future bypass interchange should not be included in the PSP. If the roundabout at McGregor Road as exhibited is required to service the broader PSP, then any land take necessary within the PSP area should be considered now and included as an ICP land project, and the costs associated with the construction the roundabout, (or any alternative interim intersection treatment) should be included as an ICP intersection project.

Requested Changes: Review ICP item RD02, specifically why the ultimate construction is included in the ICP. Review the project description for ICP item IN01. Review whether ICP culvert projects are required due to the increased scope of works associated with Greenhills Road and its various intersections. Review the intersection treatment for the E-W Connector Street and McGregor Road, and include as an ICP item.

3. Requested Changes Summary Table

The below table summarises the requested changes to the PSP outlined in the Key Issues above, as well as listing some additional changes.

Page/Plan/Reference	Requested Change	Rationale
Key Issues		
Plan 4 – Pg 12	Amend Plan 4 and subsequent plans to relocate the north-south local access street from the eastern side of the LCC on Property 2 to the eastern boundary of Property 1.	Relocating the local access street to Property 1 allows the property direct access to Greenhills Road, and removes the need to rely on connecting roads being provided within the adjacent property.
Pg 21	Remove R9, R12, G13 and Illustration 1.	The proposed 30 metre buffer from heritage place HO14 unreasonably impacts Property 1.
Pg 22	Remove G16 and G17. Built form requirements and guidelines within Section 3.2.1 of the PSP to be reviewed, and incorporated into separate Industrial Design Guidelines if necessary.	Section 3.2.1 of the PSP includes a number of built form requirements and guidelines that appear excessive and irrelevant to the future subdivision of land within the precinct. These requirements would be better suited within separate Industrial Design Guidelines.
Pg 24 -25	Remove R15, G28. Amend Illustration 2 – Local Convenience Centre Concept Plan to show local access street on western side of HO14.	Local Access Street proposed on eastern side of the Convenience Centre should be relocated to the eastern boundary of Property 1. Access to the Convenience Centre can be obtained through the heritage place.
Pg 30	Amend Plan 8 – Native Vegetation Extent to identify that all native vegetation is to be removed.	It is currently not clearly identified that all native vegetation within the precinct can be removed.
Pg 33 Pg 35	Remove G36. Review R37 and R40.	The requirement for street block lengths not exceeding 200 metres does not translate to an industrial context.

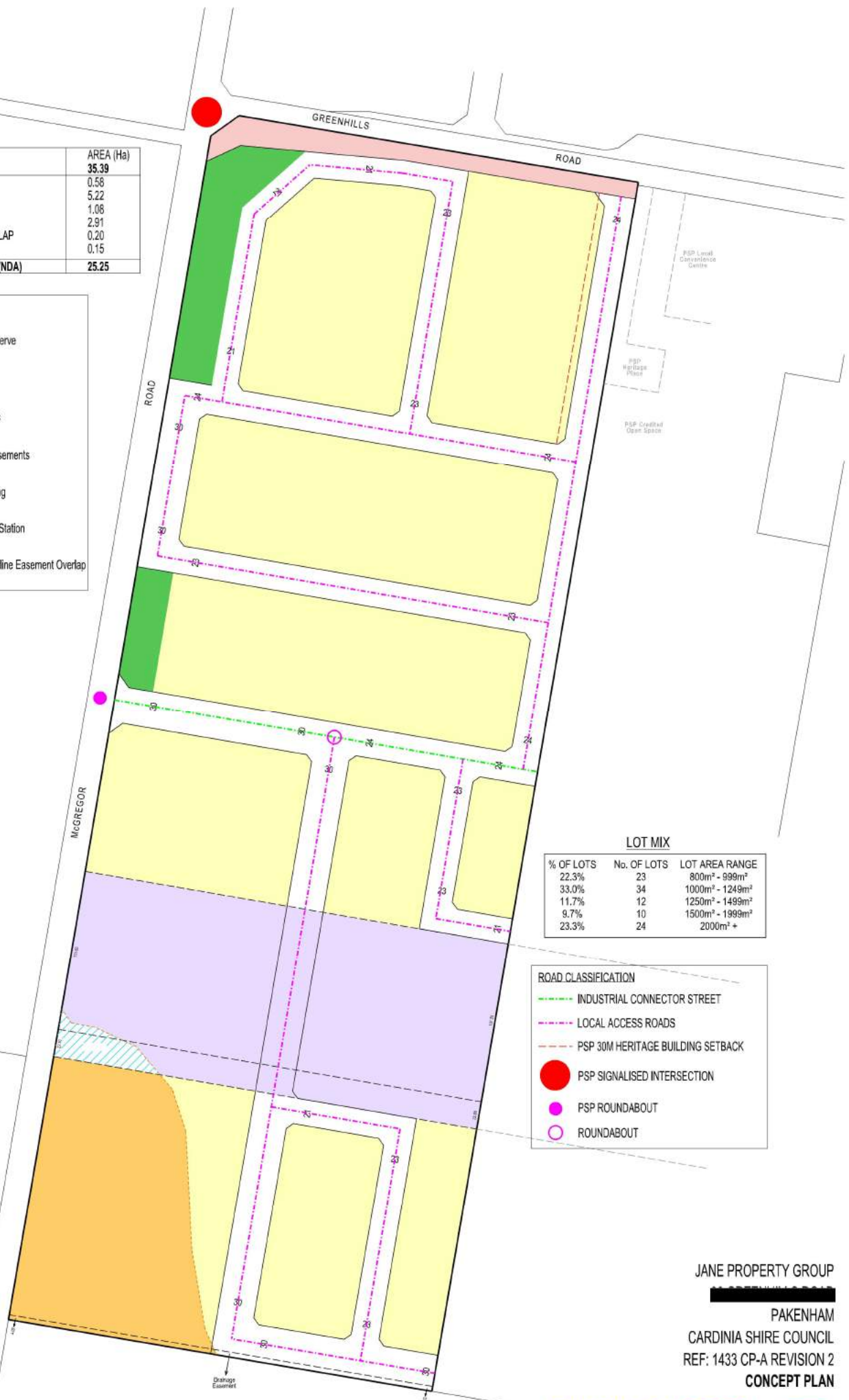
		Broader guidelines relating to street permeability should be incorporated.
Plan 12 – Pg 40	Amend Plan 12 – Utilities of the PSP to remove the proposed permanent sewer pump station and review whether drainage assets within Property 1 are accurately located and required.	There appear to be inconsistencies shown on the Plan with regard to the proposed permanent sewer pump station and South East Waters Sewer Strategy Plan, as well as with the drainage assets shown on Property 1 and Melbourne Waters Deep Creek South DSS Map.
Pg 46-47	Review ICP items RD02 and IN01, and review whether culverts to be included in ICP	<p>Item RD02 – review why the ultimate construction is included in the ICP.</p> <p>Item IN01 – Project Description to be reviewed.</p> <p>Consider whether culverts should be included in the ICP if required in the PSP.</p>
Additional Issues		
Appendix C – Pg 56	Cross Sections to be amended to include the Local Access Street Cross Sections (with and without drainage).	Local Access Street Cross Sections have been omitted from the PSP.
Plan 4 – Pg 12	The north-south Access Street to the south of the east-west Connector Street on Property 1 should be realigned to run parallel to the PAO.	Current road layout results in awkward subdivision layout.
Pg 20	Remove R8 (retaining structures)	Given the large size of the building floor plates it is extremely difficult to achieve this outcome in industrial development. The stepping of buildings is not practical and therefore making this a 'Requirement' is overly restrictive.

Pg 41	Remove R51 and R52	These requirements are permit conditions and therefore it is not appropriate to include in the PSP
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Appendix 1 – Concept Plan (Charlton Degg, November 2020)

SITE AREA	AREA (Ha)
ARTERIAL ROAD WIDENING	35.39
POWERLINE EASEMENT	0.58
DRAINAGE RESERVE	5.22
PAO	1.08
PAO & POWERLINE EASEMENT OVERLAP	2.91
SEWER PUMP STATION	0.20
SEWER PUMP STATION	0.15
OVERALL NET DEVELOPABLE AREA (NDA)	25.25

LEGEND	
	Drainage Reserve
	PAO
	Industrial Lots
	Powerline Easements
	Road Widening
	Sewer Pump Station
	PAO & Powerline Easement Overlap



LOT MIX		
% OF LOTS	No. OF LOTS	LOT AREA RANGE
22.3%	23	800m ² - 999m ²
33.0%	34	1000m ² - 1249m ²
11.7%	12	1250m ² - 1499m ²
9.7%	10	1500m ² - 1999m ²
23.3%	24	2000m ² +

ROAD CLASSIFICATION	
	INDUSTRIAL CONNECTOR STREET
	LOCAL ACCESS ROADS
	PSP 30M HERITAGE BUILDING SETBACK
	PSP SIGNALISED INTERSECTION
	PSP ROUNDABOUT
	ROUNDABOUT

JANE PROPERTY GROUP

PAKENHAM

CARDINIA SHIRE COUNCIL

REF: 1433 CP-A REVISION 2

CONCEPT PLAN

SCALE 1:1500 at A1
15 0 30 60 90m

AUTHORISED : MND 24/09/2020
DATE OF SURVEY : N/A
DATE PRINTED : 19/11/2020

REF : 1433
LEVEL DATUM : N/A
SHEET : 1 of 1

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Appendix 2 – Traffic Engineering Assessment (Traffix Group, November 2020)

Traffix Group

Traffic Engineering Assessment

Future Industrial Subdivision

[REDACTED], Pakenham

Prepared for
Jane Property Group

November 2020

G29228R-01B

Document Control

Our Reference: G29228R-01AA

Issue No.	Type	Date	Prepared By	Approved By
A	Draft	24/11/20	N. Woolcock	D. Trotter
B	Final	26/11/20	N. Woolcock	D. Trotter

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Appendix A Indicative Potential Future Site Layout

1. Introduction

Traffix Group has been engaged by Jane Property Group to undertake a Traffic Engineering Assessment in association with land at ██████████, Pakenham which is subject to development of a Future Industrial Subdivision.

In particular, this report provides a detailed traffic engineering critique of the exhibited Draft Pakenham South Employment Precinct Structure Plan (PSP) with particular regard to the road network, access connections and pedestrian and cycle paths identified for the site at ██████████.

2. Existing Conditions

2.1. Subject Site

The subject site is located at the ██████████
██████████

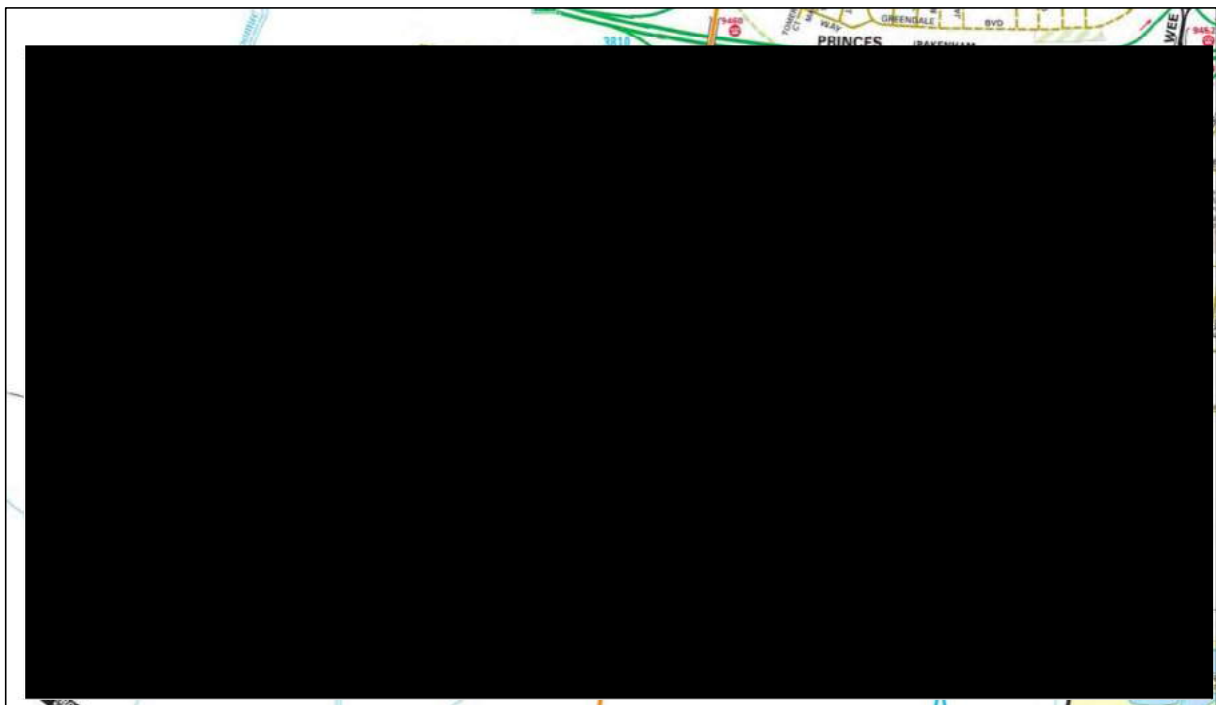


Figure 1: Locality Plan

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An aerial photograph of the subject site and its surrounds is provided at Figure 2.

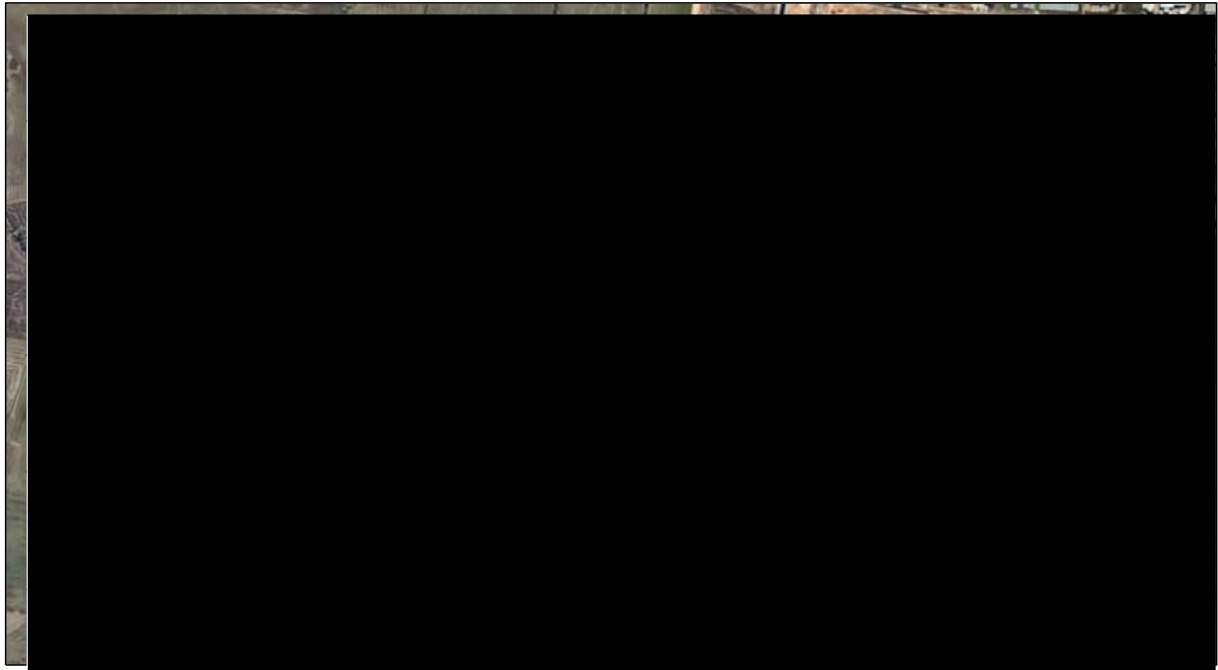


Figure 2: Aerial Photograph

Source: Nearmap

The subject site is currently zoned 'Urban Growth Zone (UGZ)' under the Cardinia Planning Scheme, as indicated at Figure 3.

Surrounding land uses are generally industrial to the north, green wedge to the south, urban growth to the east and special use to the west.



Figure 3: Land Use Zoning Map

Source: VicPlan, <https://mapshare.vic.gov.au/vicplan/>

2.2. Road Network

Greenhills Road is currently a local Council road which extends between McGregor Road to the west and Koo Wee Rup Road to the east. In the vicinity of the subject site, Greenhills Road currently has an unsealed carriageway which accommodates a single lane of through traffic in each direction. A sealed pavement is provided along Greenhills Road to the east of the subject site.

The default rural speed limit of 100km/h currently applies to Greenhills Road past the site, reducing to 70km/h to the east in association with the sealed carriageway.

Greenhills Road, adjacent to the subject site, is shown at Figure 4 and Figure 5.



Figure 4: Greenhills Road - View East



Figure 5: Greenhills Road - View West

McGregor Road is a collector road which extends between Princes Highway to the north and Soldiers Road to the south. In the vicinity of the subject site, McGregor Road currently has an unsealed carriageway that accommodates a single through lane of traffic in each direction.

The default rural speed limit of 100km/h currently applies to McGregor Road past the site, with the speed limit reducing to 70km/h approximately 500m to the north of Greenhills Road where McGregor Road has a sealed carriageway.

McGregor Road, adjacent to the subject site, is shown at Figure 6 and Figure 7.



Figure 6: McGregor Road - view south



Figure 7: McGregor Road - view north

3. Pakenham South Employment PSP

The subject site is located on the northwest corner of the Pakenham South Employment PSP area which is generally bound by McGregor Road, Greenhills Road and Koo Wee Rup Road to the west, north and east respectively. The future Koo Wee Rup Bypass alignment is identified to the south of the PSP area.

The Road Network and Public Transport and Path Network plans, as set out in the Draft Pakenham South Employment PSP, are provided at Figure 8 and Figure 9 respectively.

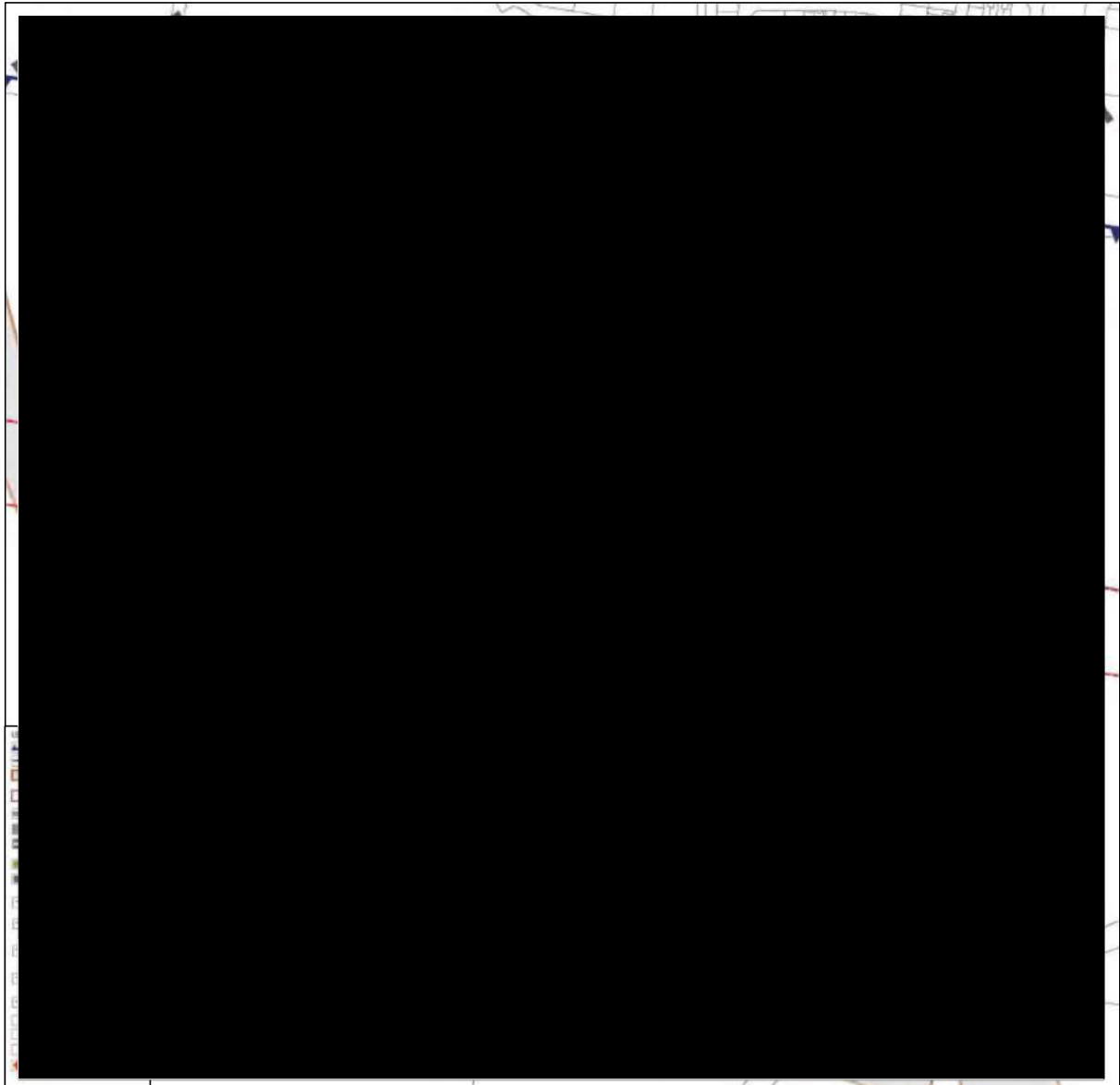


Figure 8: Pakenham South Employment PSP Road Network Plan

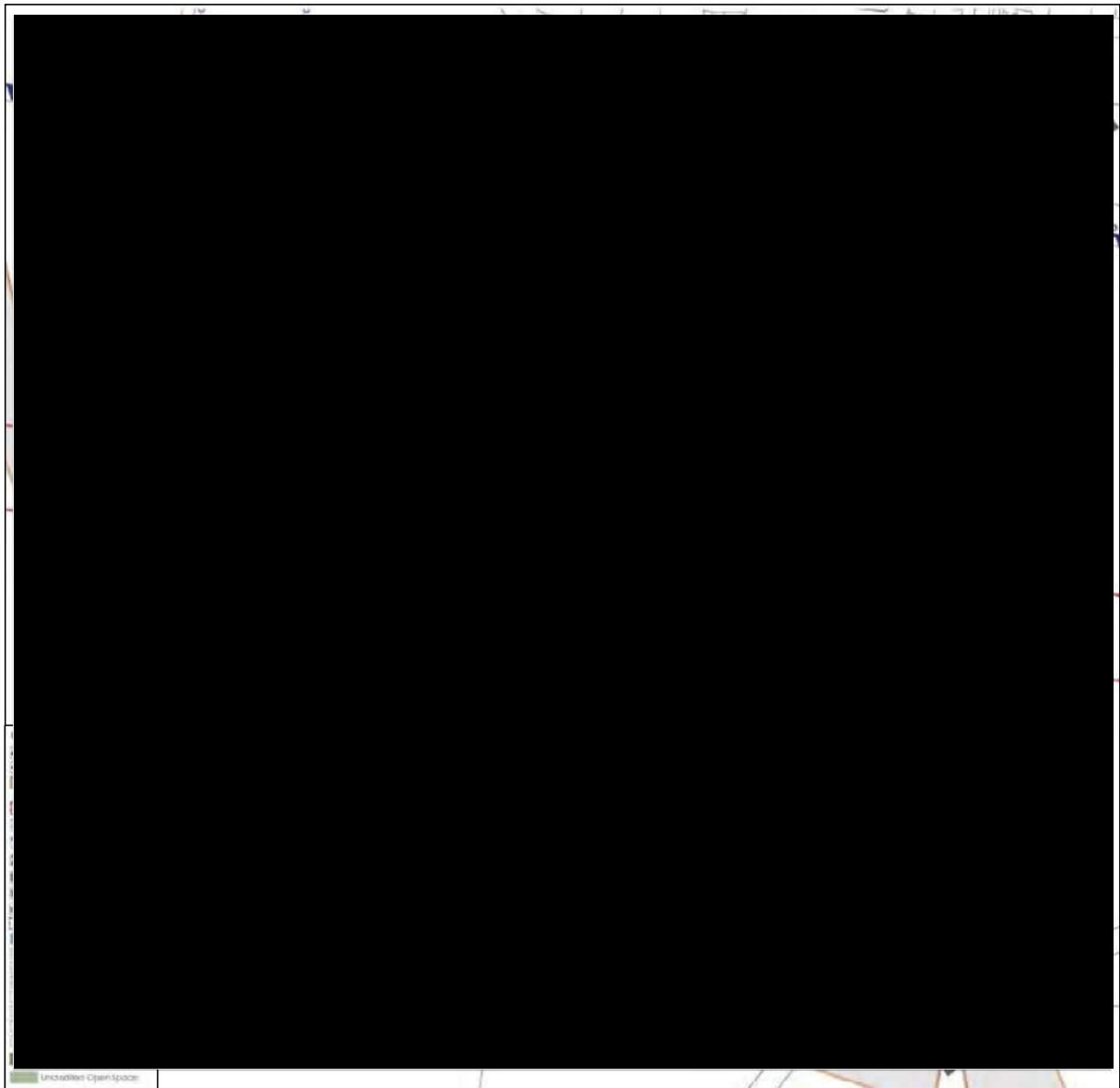


Figure 9: Pakenham South Employment PSP Public Transport and Path Network Plan

The draft Pakenham South Employment PSP documentation identifies the following in close proximity of, and within, the subject site:

1. The ultimate 34m wide (ICP¹ Item RD-01) configuration of Greenhills Road.
2. An 'industrial connector street' that is to extend generally to the east of McGregor Road, located approximately in the centre of the site.
3. Various 'industrial local access streets' that run through the site, including one that is identified to run parallel with McGregor Road and connect with, or in very close proximity of, the future McGregor Road roundabout intersection with the industrial connector street discussed above.

¹ Infrastructure Contributions Plan (ICP).

4. A series of shared paths that are to run through, and adjacent to, the site.
5. A potential bus route on Greenhills Road along the northern boundary of the site.
6. An ultimate Department of Transport (DoT) funded signalised intersection at Greenhills Road and McGregor Road at the site's northwest boundary.
7. An interim T-intersection at the Greenhills Road and McGregor Road intersection which is understood to be funded by the South East Business Park which is located immediately north of Greenhills Road.
8. A developer funded roundabout at the site's 'industrial connector street' connection with McGregor Road.
9. An 'industrial local access street' that is to extend generally to the south of Greenhills Road within 100m to the east of the subject site's eastern boundary.

Each of the above dot points is identified on enlarged sections of the draft PSP Road Network and Public Transport and Path Network plans in Figure 10 (in red).

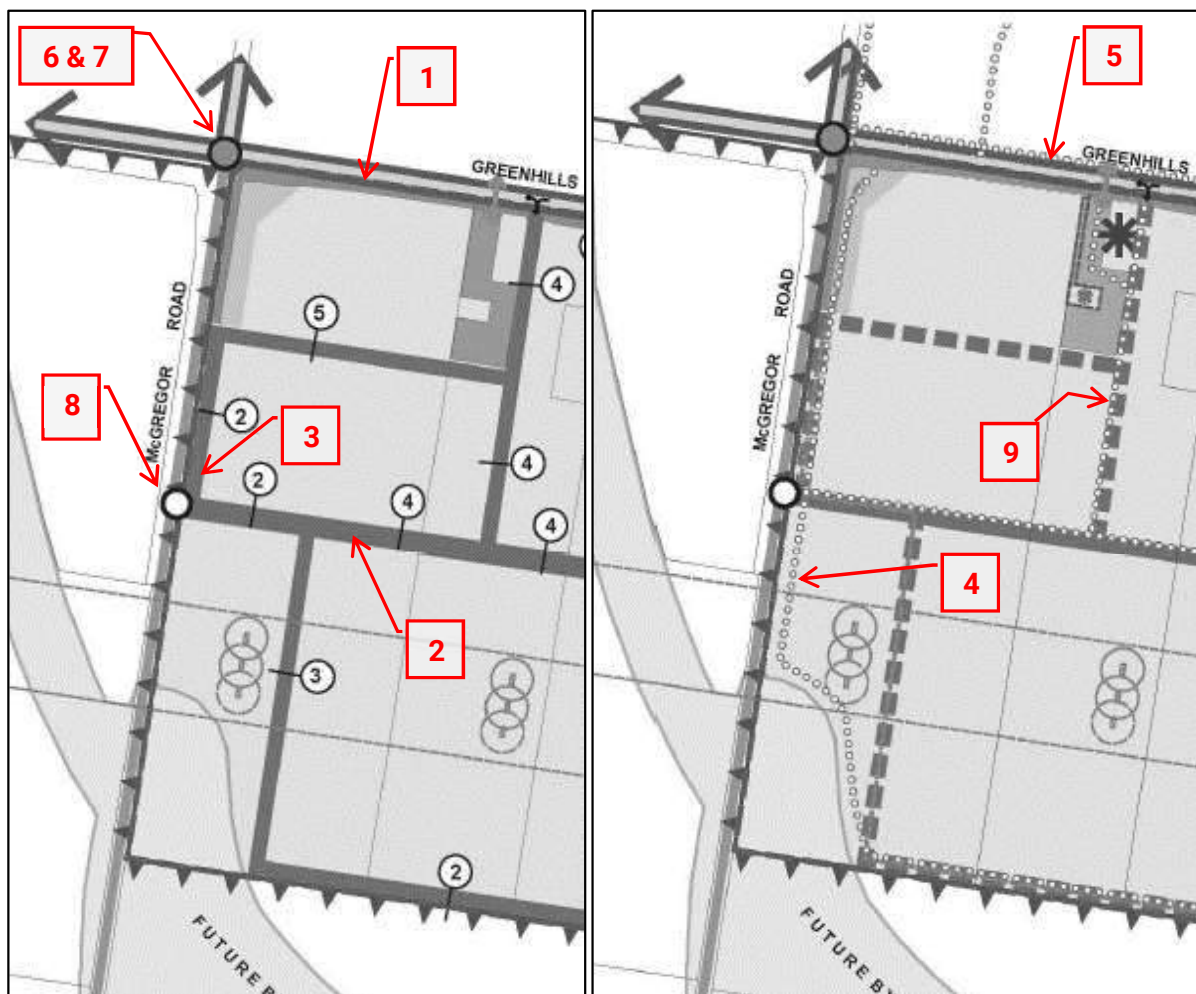


Figure 10: Key Traffic Engineering PSP Items Associated with the Subject Site

The draft PSP documentation informs that **Greenhills Road** is to ultimately be constructed as an arterial road which will provide a 34m wide cross-section accommodating dual 7m wide carriageways separated by a central median.

The arterial road cross-section for Greenhills Road is shown at Figure 11 and includes a 3m shared path along its northern side and a 3m two-way bikeway and 1.5m wide footpath along its southern side. The additional land required to accommodate the ultimate Greenhills Road road reservation (ICP Item RD-01) is to be set aside to the south of the existing road reservation, including across the northern part of the subject site.

Of note is that the entire existing carriageway of Greenhills Road is to be sealed by the South East Business Park, including adjacent to the subject site, whilst the second (southern) carriageway (ICP Item RD-02) and additional land to construct the same (ICP Item RD-01) are to be funded by the Pakenham South Employment PSP.

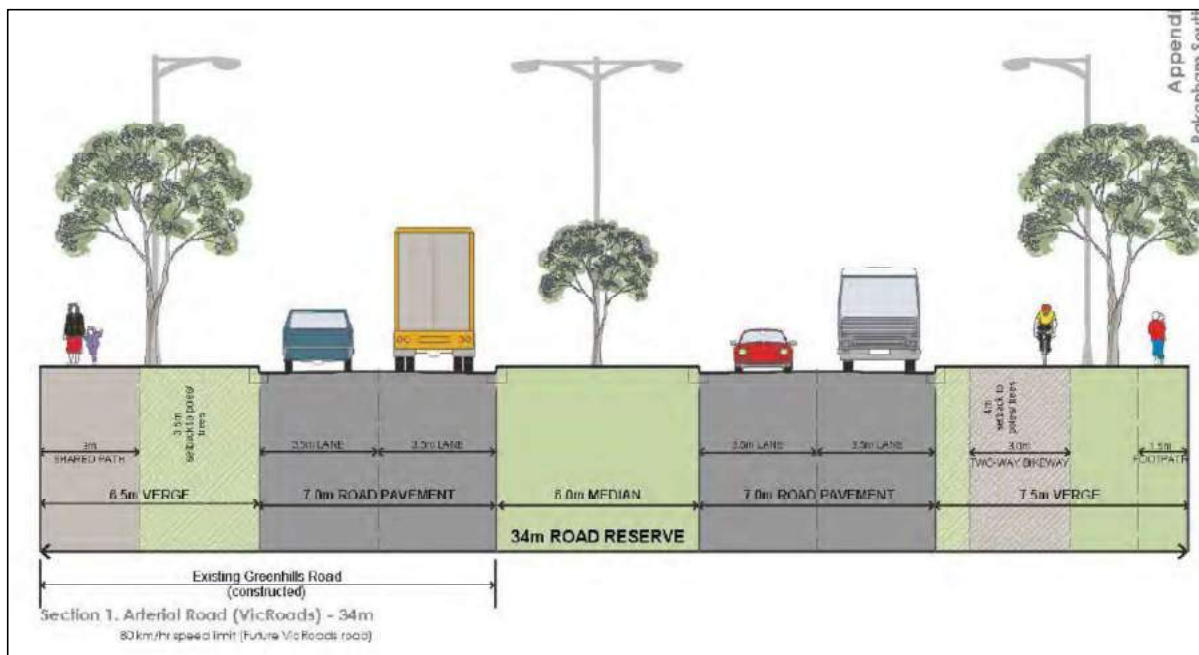


Figure 11: Greenhills Road - Ultimate Cross Section

No details are provided in the Draft Pakenham South PSP regarding any upgrades to McGregor Road.

4. Traffic Engineering Critique of Key Elements

This section provides details of various traffic engineering elements of the draft PSP documentation that are pertinent to the subject site and for which we believe further details, clarification or modification should be sought prior to the Pakenham South Employment Precinct Structure Plan being finalised.

4.1. Road Cross-Sections and Hierarchy Definitions

There appears to be some discrepancy between the draft PSP Road Network plan and road descriptions in the draft cross-sections that are included at Appendix C of the draft PSP document. For example, the 'grey' lines identified on the draft PSP Road Network plan are all identified as 'industrial local access streets' in the associated 'legend' however, they are all referred to as various types of connector streets in the cross-section drawings.

Furthermore, two roads within the Road Network plan are identified as cross-section 2 as shown in Figure 12 even though they appear to clearly have a different function.



Figure 12: Conflicting Cross-Section Example

It is recommended that a review of the street classification and associated cross-section identifiers and drawings be undertaken and updated prior to the PSP being finalised to avoid any confusion at the time of submitting a future town planning application for the subdivision of the site.

4.2. Shared Path Network

As mentioned previously, the draft PSP Public Transport and Path Network plan identifies a number of future shared paths that are required within, adjacent and nearby to the subject site

which we believe will ultimately assist in providing for an excellent level of pedestrian and cycle accessibility to, from and within the overall precinct.

Whilst it is typically very clear where these shared paths are to be located, it is unclear to us where the shared path is to be located on the east side of McGregor Road, to the south of the identified connector road² that is to extend in a general eastern direction approximately midway through the site.

Accordingly, given that this section of shared path forms part of an overall pedestrian and cycle network for the wider area, and that no road or drainage reserve (or similar) is required or identified for the shared path to be included in, it is assumed that it is to be accommodated within the McGregor Road and 'future bypass (PAO)' reservations. Alternatively, we see no reason why it could not instead be deviated slightly within the site and continue to form part of the identified road and drainage network as shown below.

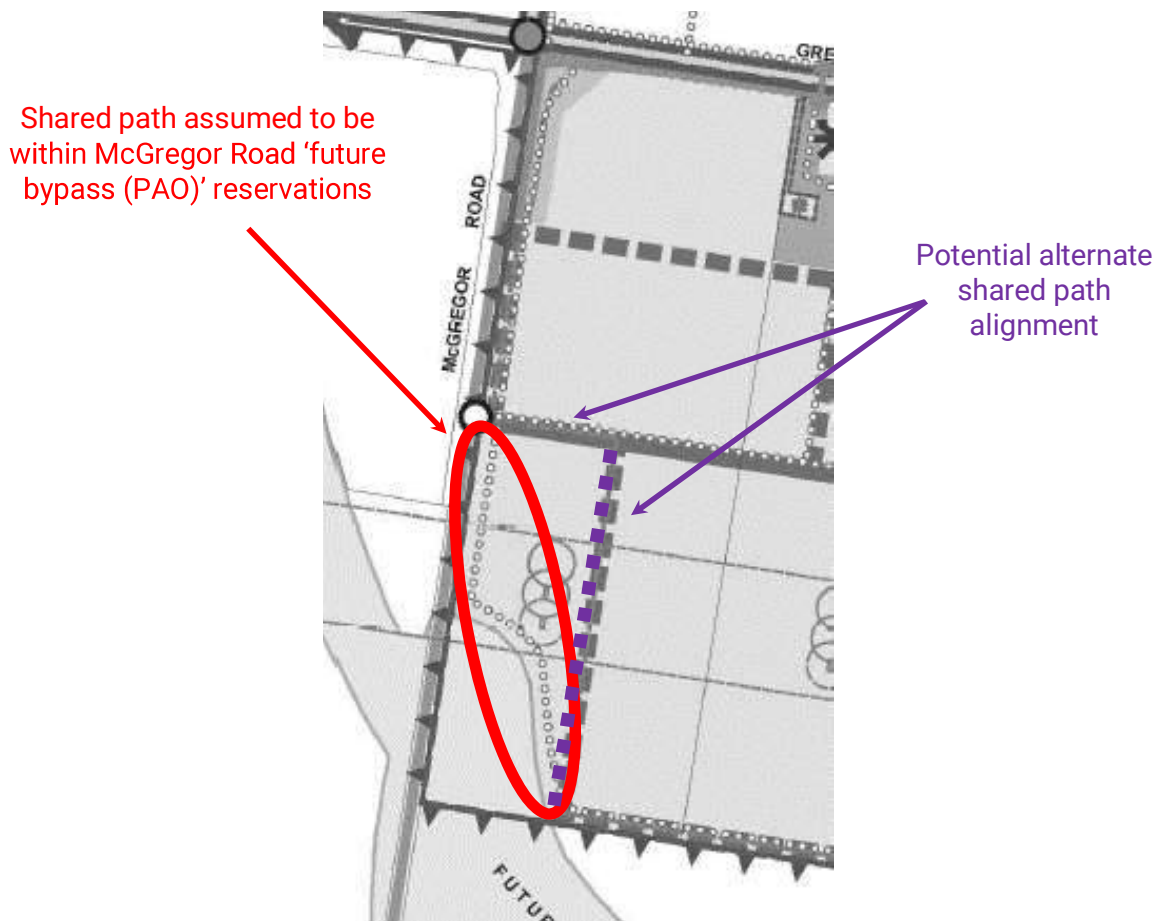


Figure 13: Shared Path Clarification or Alternative

Alternatively, if relevant authorities are adamant that it needs to run parallel with McGregor Road and along part of the 'future bypass (PAO)' without being accommodated within the reservations of each, then we believe the required width of land should be identified within the

² It is assumed that the shared path could be located within what is identified as 'uncredited open space' and the road that is identified to run parallel with McGregor Road along the 'proposed drainage line' to the north of this future connector road.

PSP and such land included as an associated ICP item given that it would result in a compromise as to how the future subdivision could be created.

4.3. Road Running Parallel with McGregor Road

As mentioned earlier, the draft PSP Road Network plan identifies a road within the site that is to run parallel with McGregor Road to the north of the industrial connector street that is identified to run in a general easterly direction from McGregor Road approximately centrally through the site.

It is our opinion that there is no safe and efficient intersection arrangement that could be provided at the southern end of this road given that it is identified to terminate at the abovementioned industrial connector street in very close proximity of McGregor Road and a future roundabout that is identified in the PSP.

We have undertaken an assessment of how an appropriate treatment could be accommodated for this road, noting that it also forms part of a drainage line, and believe that the only outcome that would appropriate is to deviate the southern end of the road to the east so that it is able to connect with the abovementioned industrial connector street at an appropriate offset distance from McGregor Road. It would be appropriate for the deviated section of road to have a reduced road reservation, given that it would not form part of the drainage line. Notwithstanding, a drainage reserve would still need to be provided parallel with McGregor Road to the south of the deviated section.

An example of how we believe this could be reflected on an amended PSP Road Network plan is shown in Figure 14

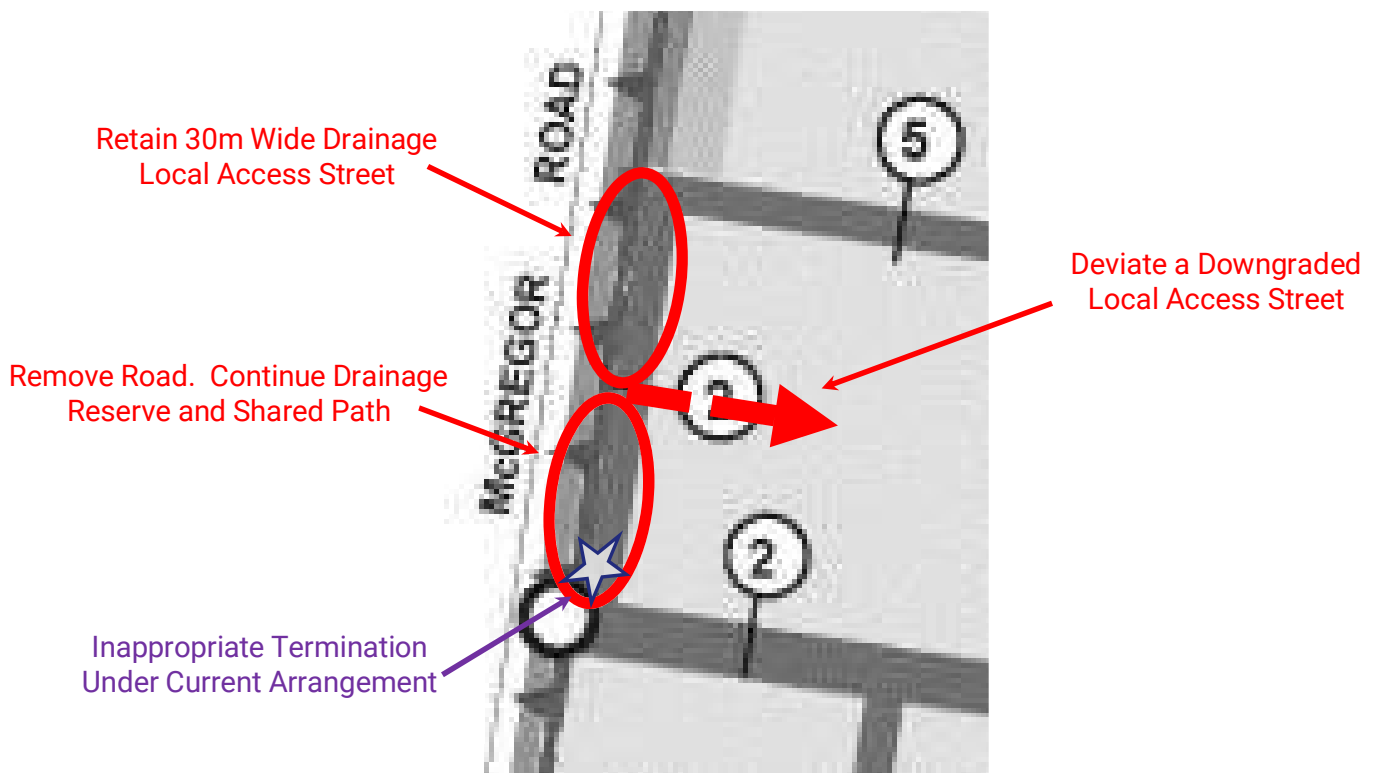


Figure 14: Potential PSP Update to Reflect Appropriate Separation to McGregor Road

4.4. Local Industrial Access Streets

The draft PSP does not currently identify requirements for a standard industrial local access street, i.e. PSP only identifies roads on the Road Network plan that are typically higher order roads (both internal and external). There also does not appear to be a standard industrial access street cross-section on Council's website or within the Engineering Design and Construction Manual for Subdivisions in Growth Areas (EDCM) which applies to the Cardinia Shire (amongst others). Given this, we believe that it would be prudent to include a standard industrial access street cross-section in the final PSP in order to avoid potential inconsistency and dispute when future subdivision applications are made and constructed.

We understand that equivalent roads within the developing South East Business Park immediately to the north of the Pakenham South Employment PSP area have an approximate 12.6m wide carriageway (which includes on-street parking) centrally located within an approximate 23m wide road reservation. We believe that a similar cross-section should be identified within this PSP. It is further noted that it would generally be appropriate for no parking to be provided on the side of any road that is not adjacent to future allotments and we also believe that an associated note regarding this should be included within the PSP. An example of this is for roads which traverse the transmission easement (east-west alignment) that runs through the entire PSP area and will not have any allotments on either side as a result.

4.5. Vehicle Access via Greenhills Road

The current PSP Road Network plan does not identify any vehicle access to or from the subject site via Greenhills Road. Rather, a north-south aligned industrial local access street is proposed some 100m to the east of the subject site's eastern boundary, proposed to connect to Greenhills Road. It is further noted that this access street is identified as ultimately accommodating left-in and left-out movements only from and to Greenhills Road respectively.

It is our opinion that a better overall interim and ultimate outcome would be achieved if this road were instead relocated along the eastern boundary of the subject site.

Not only is the subject site approximately twice the size of the adjacent site to the east where the road is currently identified, but relocating it to the west within the subject site would mean that it would be virtually centrally located between McGregor Road to the west and a future industrial connector road that is identified to the east.

Furthermore, importantly it would be sufficiently offset from the McGregor Road/Greenhills Road intersection to ensure that there is no compromise to the ultimate design/construction of each intersection, particularly when considering that this industrial local access street is identified as a left-in/left-out only arrangement with Greenhills Road under ultimate conditions.

We further understand that development of the subject site is envisaged to commence imminently following PSP finalisation and following submission of a town planning application and subsequent permit. If the aforementioned industrial local access street was to be relocated some 100m west of its current location (i.e. within the subject site) this means that there would be no need to potentially obtain temporary vehicle access to Greenhills Road as part of the development of the subject site and/or rely on connecting roads being provided

within the adjacent land in order to access the site³. Instead, future development of the site to the east would be able to take access directly off the proposed relocated road without relying on any further connections given it is proposed to be aligned along the eastern boundary of the subject site.

It is further noted that good access would continue to be provided to and from the 'local convenience centre' that is identified on the northeast corner of the adjacent local park/heritage site. In particular, a pedestrian/cycle path could be provided through the local public open space to provide easy access for anyone who chooses to park within the subject site or general pedestrians to/from the west. Vehicle access to the on-site carpark, within the local convenience centre, will also continue to be possible under such an arrangement.

4.6. McGregor Road Roundabout

We do not believe that there would be a requirement to provide a roundabout on McGregor Road as part of the development of the subject site (entire PSP area) based on the current surround conditions. McGregor Road is currently unconstructed along the site's abuttal and the land immediately to the south of the subject site is outside of the Urban Growth Boundary.

Accordingly, low traffic volumes are expected to continue to be generated to the south of the identified McGregor Road connection with the subject site (entire PSP area) and we see no reason in a capacity or safety sense why a roundabout would be necessary.

However, we further note that the alignment of the future Koo Wee Rup Bypass is effectively along the southern boundary of the subject site (and entire PSP area) and that a future interchange appears to be contemplated with McGregor Road effectively at the southwest corner of the subject site (entire PSP area). As a result of this potential bypass interchange, a significant amount of additional traffic would likely be generated to the south of the identified McGregor Road connection with the subject site (entire PSP area) and any requirement for a roundabout on McGregor Road as identified within the PSP would be as a direct result of the future bypass interchange.

Accordingly, we believe that rather than there be a requirement to construct a roundabout as part of the PSP, that land required for the future construction of the roundabout instead be set aside (both within the subject site and the land to the west) so that it can be constructed as part of the bypass project. We also believe that such land within the subject site (and entire PSP area) should be an ICP item given that any future roundabout would serve the entire PSP area as a direct result of access being much more readily available via the future bypass. Alternatively, if the roundabout is still required as part of the PSP, then the entire roundabout construction cost and relevant land component should be included as ICP items.

5. Summary

A summary of our critique of the Draft Pakenham South Employment PSP with particular regard to the site at 30 Greenhills Road is presented in Table 1, with a draft subdivision layout showing how the site could potentially be developed if the associated recommendations were adopted attached at Appendix A.

³ We understand that the initial development stages of the subject site are proposed via Greenhills Road in order to be able utilise what is likely to be an initially constructed sealed carriageway along its length and activate the entire PSP area.

Table 1: Summary of Key Site Specific Traffic Engineering PSP Matters

Issue	Discussion	Recommendation
Road Cross-Sections and Hierarchy Definitions.	There are discrepancies within the draft PSP between various road cross-sections, hierarchy definitions and identifiers as discussed in detail in Section 4.1.	A review of the street classification and associated cross-section identifiers and drawings should be undertaken and the PSP be updated accordingly.
Shared Path Network.	It is unclear where the future shared path identified towards the southwest corner of the PSP area should be located, as discussed in detail in Section 4.2.	Obtain confirmation that the shared path identified along the southwest part of the PSP area is to be fully located within the McGregor Road/'future bypass (PAO)' reservations OR that the relevant section of the shared path instead be aligned within the subject site within currently identified road reservations. The PSP Public Transport and Path Network plan be updated accordingly OR that the land required to accommodate the relevant section(s) of shared path are identified as an ICP item.
Road Running Parallel with McGregor Road.	The southern end of the road that is identified to run adjacent to, and parallel with, McGregor Road is identified to inappropriately terminate in very close proximity of McGregor Road, as discussed in detail in Section 4.3.	The PSP Road Network Plan be updated to identify a road deviation, as nominated within this report, such that the road does not inappropriately connect in very close proximity of the future roundabout.
Local Industrial Access Streets.	No standard local industrial access street cross-section is currently identified in the PSP, as discussed in detail in Section 4.4.	That a standard local industrial access street cross-section be prepared and provided within the PSP. Notation be provided within PSP that no on-street parking is necessary on the side(s) of roads that are not adjacent to future allotments.
Vehicle Access via Greenhills Road.	The nearest road connection with Greenhills Road to the PSP area, east of McGregor Road, would be better located along the eastern boundary of 30 Greenhills Road, approx. 100m west of current PSP location, as discussed in detail in Section 4.5.	The PSP be updated to identify an industrial local access street running along the eastern boundary of 30 Greenhills Road that ultimately allows for left-in/left-out movements at its intersection with Greenhills Road. In other words, relocation of the industrial local access street shown within the PSP as providing a connection with Greenhills Road, some 100m west, being located within the subject site.

Traffic Engineering Assessment

██████████, Pakenham

Issue	Discussion	Recommendation
McGregor Road Roundabout.	There is no reason in a capacity or safety sense to construct a roundabout on McGregor Road to provide access to the site (and entire PSP area) unless a McGregor Road interchange is provided as part of the future Koo Wee Rup Bypass as discussed in detail in Section 4.6.	The land required to construct a roundabout that may be required on McGregor Road as part of what should instead be included in the future Koo Wee Rup Bypass project be set aside within the subject site (entire PSP area) and included as an ICP item. Alternatively, the roundabout construction cost and relevant land component be included as ICP items.

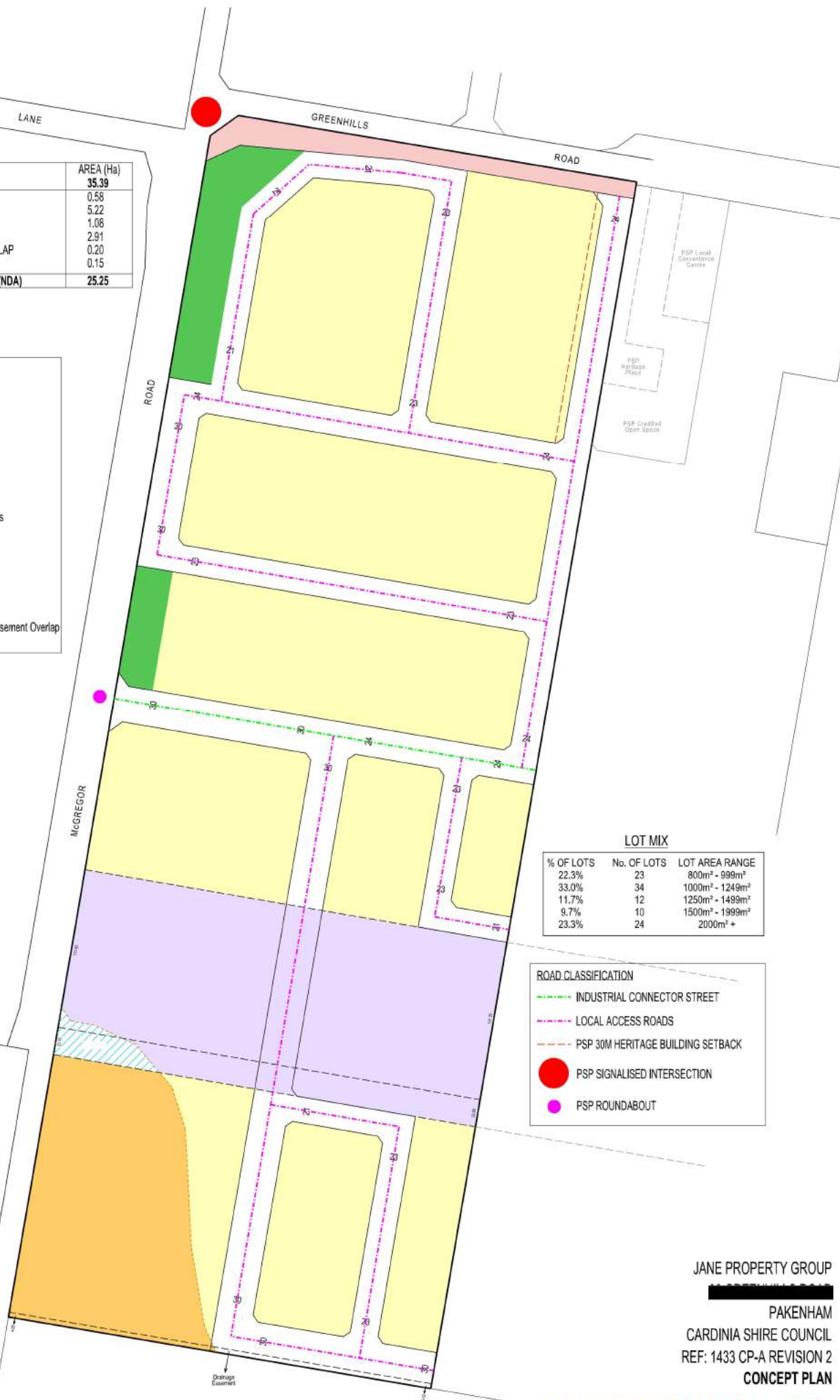


Appendix A






Indicative Potential Future Site Layout

SITE AREA	35.39
ARTERIAL ROAD WIDENING	0.58
POWERLINE EASEMENT	5.22
DRAINAGE RESERVE	1.08
PAO	2.91
PAO & POWERLINE EASEMENT OVERLAP	0.20
SEWER PUMP STATION	0.15
OVERALL NET DEVELOPABLE AREA (NDA)	25.25

LEGEND	
	Drainage Reserve
	PAO
	Industrial Lots
	Powerline Easements
	Road Widening
	Sewer Pump Station
	PAO & Powerline Easement Overlap



LOT MIX		
% OF LOTS	No. OF LOTS	LOT AREA RANGE
22.3%	23	800m ² - 999m ²
33.0%	34	1000m ² - 1249m ²
11.7%	12	1250m ² - 1499m ²
9.7%	10	1500m ² - 1999m ²
23.3%	24	2000m ² +

ROAD CLASSIFICATION	
	INDUSTRIAL CONNECTOR STREET
	LOCAL ACCESS ROADS
	PSP 30M HERITAGE BUILDING SETBACK
	PSP SIGNALISED INTERSECTION
	PSP ROUNDABOUT

JANE PROPERTY GROUP

PAKENHAM
CARDINIA SHIRE COUNCIL
REF: 1433 CP-A REVISION 2
CONCEPT PLAN

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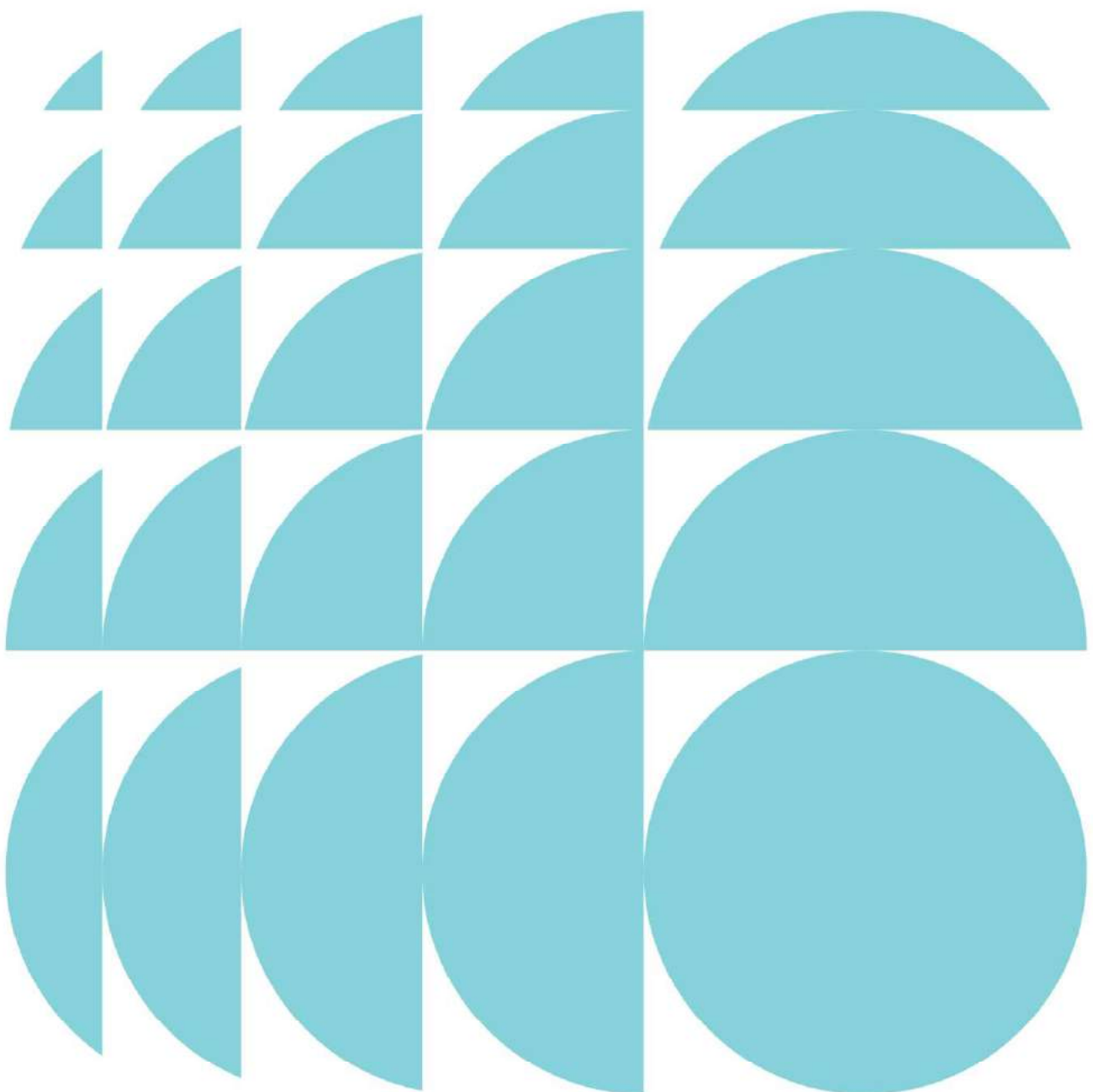


**ETHOS
URBAN**

**Pakenham South Employment
Precinct Structure Plan
Landowner Submission**

Submitted to Cardinia Shire Council
On behalf of Parklea

November 2020



CONTACT

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26 November 2020

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1.0 Introduction

1.1 Pakenham South Employment Precinct

Ethos Urban have been engaged by Parklea to make a submission in relation to proposed Amendment C265.

The amendment proposes to incorporate the *Pakenham South Employment Precinct Structure Plan, October 2020* ('the PSP') into the Cardinia Planning Scheme, rezone the land within the precinct to Urban Growth Zone Schedule 6 to facilitate the development of the land generally in accordance with the PSP and makes a number of other consequential changes to the Cardinia Planning Scheme to support the implementation of the PSP.

Parklea have a range of interests throughout the Cardinia Urban Growth Corridor, including residential, industrial and activity centre land. Parklea's landholdings in the corridor are depicted at Appendix B.

1.2 Summary of the Submission

Parklea's submissions with respect to proposed Amendment C265 are as follows:

- Existing provision of zoned and yet-to-be-zoned employment land in Pakenham-Officer SSIP has "*more than 100 years of available employment land*" based on approximately 1,300ha of zoned land, a plot ratio of 80% and current take-up rates (SGS Economic Assessment). On this basis, the current timing of the preparation of the Pakenham South employment precinct structure plan is a matter of concern, having regard for likely oversupply of employment land in the Shire resulting from the implementation of the PSP.
- The zoning of additional industrial land in the Pakenham South precinct would undermine the viability of the planned Cardinia Road Employment Precinct (CREP) as the planned employment hub of the Officer – Pakenham Industrial/Business Corridor.
- The proposed application of the IN1Z to the Pakenham South PSP will result in land within CREP being at a competitive disadvantage due to the complexity of the UGZ schedule that applies to this land.

This submission is supported by a review undertaken of the SGS Economic Assessment that was prepared to support the Draft Pakenham South PSP. This peer review is included at Appendix A.

For Cardinia Shire to achieve successful planning outcomes for both the Cardinia Road Employment and Pakenham South Employment Precincts, Parklea request that this Amendment be abandoned at this point in time on the basis that the preparation of the PSP is premature.

2.0 Policy Review

The following section reviews relevant state and local strategic policies that indicate the plan for the Officer-Pakenham State-Significant Industrial Precinct (SSIP) and the delivery of industrial land supply in the region.

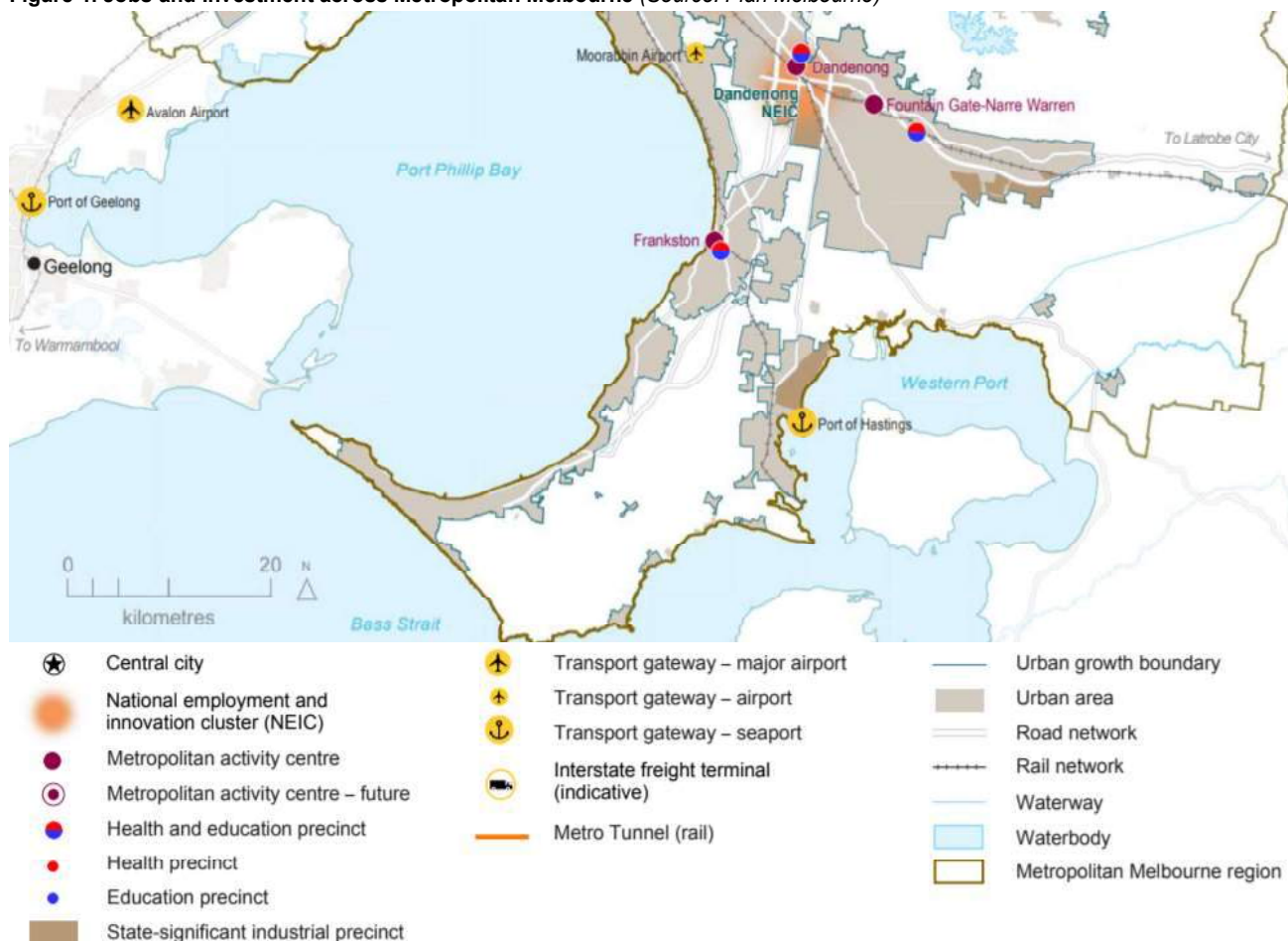
2.1 Plan Melbourne 2017-2050 (Victoria State Government, 2017)

Released in March 2017, Plan Melbourne is a long-term plan to accommodate Melbourne's future growth in population and employment. The Plan states that there are five State-Significant Industrial Precincts, including the Officer – Pakenham SSIP, all of which seek to provide strategically located land for major industrial development linked to the Principal Freight Network and transport gateways.

The Plan aims to ensure that state-significant industrial precincts will be protected from incompatible land uses to allow for their future growth. Future industrial land is to be identified in strategic locations to ensure there is sufficient land available for major industrial development linked to the Principal Freight Network and transport gateways and networks.

According to Direction 1.1, Melbourne must ensure that well-priced commercial and industrial land is available in locations that support and strengthen key growth industries in order to remain prosperous and attractive to investment.

Figure 1. Jobs and Investment across Metropolitan Melbourne (Source: Plan Melbourne)



Implications

- The Plan recognises the importance of the strategic release of industrial and commercial land.
- In order to be competitive, attractive and able to be developed in a coordinated fashion, land release in the Officer-Pakenham SSIP must be timed to align with demand, as required under State planning policy.

2.2 Melbourne Industrial and Commercial Land Use Plan (Department of Environment, Land, Water and Planning, 2020)

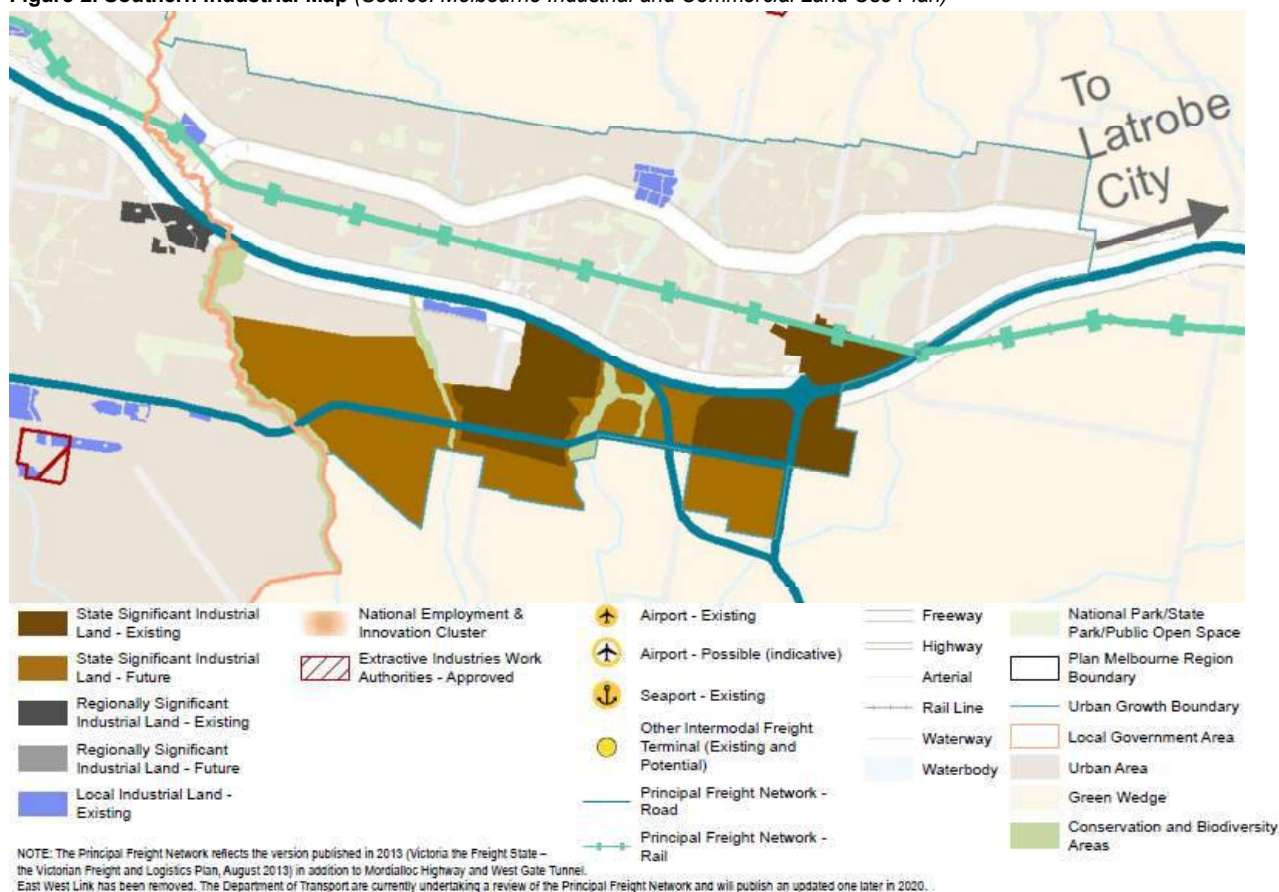
The Victorian Government released the Melbourne Industrial and Commercial Land Use Plan (MICLUP) on 6 April 2020. The purpose of the Plan is to facilitate effective planning for future employment and industry needs across metropolitan Melbourne. As in Plan Melbourne, the MICLUP identifies Pakenham South as within the Officer-Pakenham State-Significant Industrial Precinct (SSIP), which will support a range of manufacturing and commercial enterprises. The MICLUP acknowledges that most of the land in the Precinct is not currently zoned for industrial purposes and is yet to undergo a PSP process.

Across the Southern Region of Greater Melbourne there are approximately 3,520 hectares of vacant zoned and unzoned industrial land available for development, 1,260ha of which are located within the Officer-Pakenham SSIP.

According to the MICLUP, only 317.7ha of the approximate 1,580 total hectares land in the Officer-Pakenham SSIP is currently occupied, leaving over 74% of the SSIP available for future supply. MICLUP shows that the take-up rate for industrial land in 2017/18 was 13.9ha per year.

The MICLUP also recognises that planning has commenced for the Officer South and Cardinia Road Employment Precinct areas, and the importance of supporting the establishing community at Cardinia Road.

Figure 2. Southern Industrial Map (Source: Melbourne Industrial and Commercial Land Use Plan)



Implications

- A community has been established at Cardinia Road Employment Precinct, where significant industrial and commercial land has been released. Development of this employment land is yet to commence.
- There are 323.8ha of zoned, vacant land in the Officer-Pakenham SSIP, and another 938.3ha for future release, for a total of 1262.1ha of total available supply in the SSIP. Based on demand identified in the MICLUP, this equates to 91 years of zoned supply in its own right.

- Figure 2 highlights that the Pakenham South PSP area is identified as future industrial land. To develop this land now, in advance of development commencing within CREP is premature and does not align with the timeline for the release of additional industrial land in the MICLUP.

2.3 The South East Growth Corridor Plan (Victorian Planning Authority, 2012)

The South East Growth Corridor is located on the outer edge of this broader economic region and is heavily reliant on the established urban areas for jobs and services. Improving the local self-containment of jobs in the South-East Growth Corridor is a key objective of the Corridor Plan. In total, the South East Growth Corridor Plan area is expected to accommodate between 86,000 and 110,000 new jobs, across a range of employment sectors and locations.

The South East Growth Corridor Plan makes provision for:

- 2,370 (gross) hectares of industrial land;
- 1,290 (gross) hectares of business land; and
- Around 60 (gross) hectares of additional land which could also be provided, for a range of local industrial and commercial activities across residential PSPs. These will be identified as required through the PSP process.

The vision for the Corridor states that “*Development of the South-East Growth Corridor will continue to enhance the region’s self-sufficiency, sustainability and distinctiveness by providing a good range of new employment opportunities which are well-connected by appropriate transport links between homes and new and existing jobs.*” The Plan states that this includes new job opportunities to be provided at Pakenham.

The Plan includes the Pakenham South Precinct area in the Officer – Pakenham Industrial/Business Corridor, which includes the commercial and industrial land identified in the MICLUP located south of the Princes Freeway. The Corridor has good freight and public transport connections and will be an attractive location for a wide range of advanced manufacturing and commercial enterprises, as well as the more traditional manufacturing, warehouse and logistics, commercial and some high-density residential uses.

Figure 3. Employment Concept Plan (Source: South East Growth Corridor Plan)



Implications

- The Officer-Pakenham Industrial/Business Corridor is anticipated to become an attractive location for a range of industrial, commercial, and some residential uses, providing access to local jobs in Melbourne’s South East Growth Corridor.

- In order to achieve this vision, it is important that industrial and commercial land is released and developed to align with demand.

2.4 South East Economic Corridor: Strategic Context Report to 2060 (Victorian Planning Authority, November 2020)

The Context Report sets out a spatial framework for employment precincts and activity centres across Cardinia Shire. It will inform the planning of future employment precinct structure plans (e-PSPs) and will inform the employment and economic components of DELWP's Southern Metro Region Land Use Framework Plan and the South East Melbourne Councils' Vision and Action Plan. It is intended to fast-track strategic planning for the Corridor and obtain consensus on planning directions, however it is not a formally adopted Government policy.

The Context Report provides an evidence base for the preservation of employment land in these future e-PSPs to facilitate the long-term economic success of the region and local community. Relevant future e-PSPs include Officer South Employment, Cardinia Road Employment, Pakenham South Employment and Pakenham East Employment.

The Report identifies Pakenham South's strategic role as:

- State Significant Industrial Precinct (SSIP) with excellent links to possible future South East Airport via McGregor and Koo Wee Rup Roads.
- Market links to South Gippsland, Western Port Green Wedge (inputs).
- 136 ha (net) land available for freight and logistics, food/energy production, manufacturing, light and heavy industry.
- Convenience centre located towards north-western part of precinct, linking to South East Business Park.
- Accommodate some overflow from industrial areas around Pakenham as these areas transition.

Figure 4. The South East Economic Corridor in 2060 (Source: South East Economic Corridor Report)



Figure 3. Employment PSP Characteristics (Source: South East Economic Corridor Report)

Factor	Officer South	Cardinia Road	Pakenham West	Pakenham South	Croskell	Casey Fields South	Comments
Competitive advantage	H	H	H	H	M	M	The e-PSPs within the Officer–Pakenham SSIP are best places to capitalise on the SEEC's competitive manufacturing advantage, with high visibility and good access. Few and large lot sizes, and the potential for high amenity means the potential for uses that align with this competitive advantage are greatest there.
Collaboration	H	H	H	H	M	M	The possibilities for collaboration are relatively good across the e-PSPs, provided other factors (such as accessibility) enable industry and market connections to be realised. Opportunities for collaboration are higher in the SSIP given its future role in the planned employment hierarchy and future South East Airport.
Quality of place	H	H	M	M	H	L	Officer South, Cardinia Road, and Croskell are most conducive to the development of high quality urban spaces due to their location within planned residential areas, or connection to other employment places and major activity centres. These may be delivered either through public works, better connections through to existing public spaces, and/or the creation of vibrant, activated precincts.
Diversity & inclusion	M	M	M	M	M	L	Diversity across the SEEC will be optimised by understanding the advantages and key features of each of the e-PSPs.
Affordability	M	M	M	M	M	L	Affordability across the SEEC is presently relatively good, though areas most attractive to speculation are likely to have inflated land values. As the e-PSPs are planned and begin to perform better it is expected that land values generally increase. That said, it will be important to ensure a range of land values across the precinct in the short- and medium-term to ensure a diversity of uses, while strategically important uses are retained.
Critical mass	H	H	H	H	M	M	Critical masses of activity cannot be meaningfully assessed at the e-PSP level. Ultimately, with a more strategic approach to land use and economic activity across the SEEC, a critical mass of activity that drives precinct success can be delivered.
Infrastructure	M	M	M	M	M	L	The e-PSPs contain limited infrastructure today, but most have good connectivity to main roads. For the e-PSPs likely to play a larger role in setting the strategic direction of the precinct (i.e. the Officer–Pakenham SSIP), significant investment in the building stock and transport connections will be required to support strategic objectives.
Transport & accessibility	H	H	H	H	M	M	The e-PSPs in the vicinity of the Princes Freeway are in general the most accessible, which is a key part of the greater potential for economic activity that exists in these precincts.
Anchor institutions	H	H	M	M	M	L	There are no anchor institutions in the e-PSPs today, however there are several key anchors across and near the SEEC that can be leveraged by creating. Realistically, Officer South or Cardinia Road are the most likely candidate for an institutional use, given their higher level of connectivity to the Princes Freeway and position within the SSIP.

The employment forecasts show that the e-PSPs in the Officer – Pakenham Industrial/Business Corridor are not expected to be delivered in the short – medium term. The Pakenham South PSP is expected to deliver additional employment from 2030 onwards.

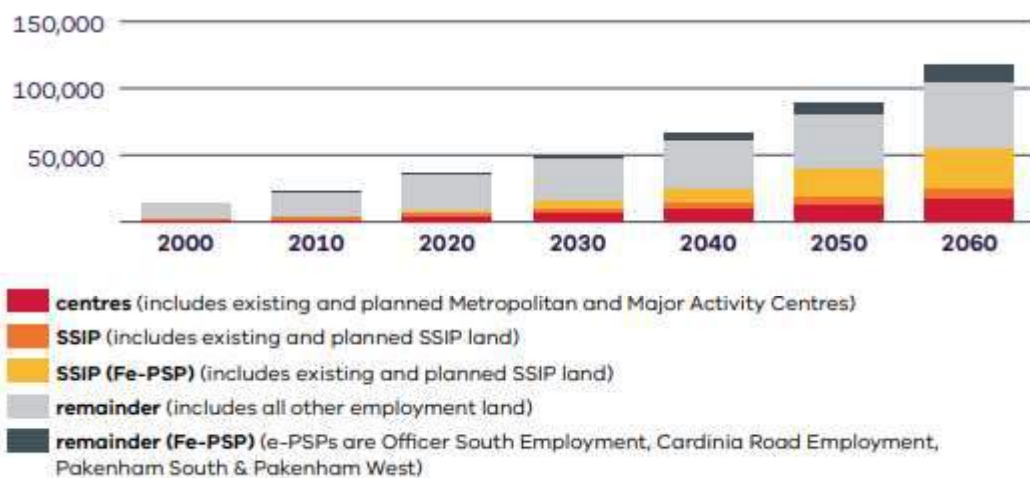
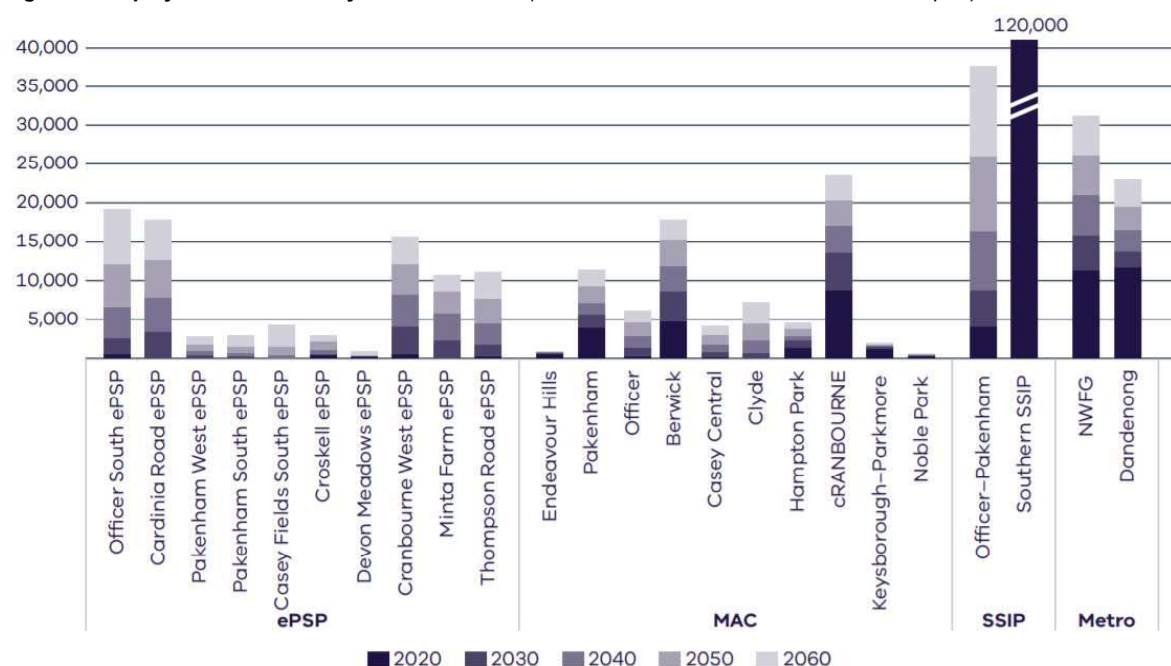
Figure 4. Employment forecasts by broad location for Cardinia Shire (Source: South East Economic Corridor Report)


Figure 5. Employment forecasts by SEEC locations (Source: South East Economic Corridor Report)



Implications

- Pakenham South is identified as a Future e-PSP, expected to deliver additional employment from 2030.
- However, the majority of employment growth in the Pakenham South ePSP area is anticipated to occur from 2060.
- The Precinct is to be one of the final areas of the corridor to develop, so that it may accommodate overflow from surrounding areas as they transition.

2.5 Pakenham South Employment Precinct Structure Plan: Economic Assessment (SGS Economics & Planning, August 2019)

An economic assessment of the Pakenham South Employment Precinct (PSEP) was undertaken by SGS Economics & Planning for the purpose of assisting Council with the development of the Pakenham South Employment Precinct Structure Plan. The precinct is described by SGS as *“a major economic and employment node for the rapidly growing South East Corridor”* and that the employment role of the precinct *“is critical to supporting local employment opportunities into the long term.”*

Importantly, the report highlights that the Southern SSIP, located in and around Dandenong South, *“is approaching exhaustion, with the remaining land being taken up rapidly”* and that, in this context, the Pakenham-Officer SSIP *“contains the greatest quantity of vacant employment land in the South East region.”* The report acknowledges that the Pakenham-Officer SSIP has *“significant existing capacity”* regarding employment land and that the total available zoned industrial land is around 1,300ha and represents more than 100 years of available employment land.

According to SGS, the Pakenham South Precinct has a total land area of 184.36ha (gross). Discounting this area by 20% to allow for roads, etc, SGS estimates that the net developable area totals 147.5ha. It is evident that the Pakenham South PSP employment land could accommodate 78% of employment land demand in the Cardinia Shire to 2041 (147.5ha/188.3ha). Thus, the land employment area involved in the Pakenham South PSP is significant in terms of overall employment land supply in the Shire.

The SGS report provides three potential development scenarios for the PSEP which comprise the following:

- **Option 1:** Fostering the growth of an employment precinct with some externality-generating activities.
- **Option 2:** Prioritising the establishment of externality-generating business.

- **Option 3:** Establishing an industrial precinct with an optimally located commercial centre.

SGS recommended Option 3 as the preferred development option for the PSEP, comprising the Industrial 1 Zone, together with a small area of retail floorspace. As stated by SGS, *“the Industrial 1 Zone is able to accommodate the vast majority of uses that are likely to locate in that part of the Shire”*. Under this scenario, approximately 3,720 workers would be employed in the PSEP once the area is operational.

Of interest, the report provides a SWOT analysis which includes the following **Weaknesses**:

- The precinct is in a region which has *“a significant quantity of vacant employment land”*
- *“Absorption in recent times has been slow, though rates are likely to pick up for a range of reasons”*
- *“The precinct is relatively poorly located in relation to the Port of Melbourne and Melbourne Airport”*.

Implications

- The PSEP alone could accommodate the vast majority of employment land demand in the Cardinia Shire to 2041. However, it is one of five future PSP areas in the Shire, including several that have already undergone planning processes and are in development.
- Although the significant quantity of vacant employment land is an asset to the region, it is also a weakness considering take-up in recent years has been slow.
- The PSEP should therefore not be released and developed prematurely so as to undermine its value as employment land.

2.6 Cardinia Road Employment Precinct Structure Plan (Victorian Planning Authority, September 2010)

The Cardinia Road Employment Precinct Structure Plan (CREP) adopted a precinct-based approach to enable growth and development of the Cardinia Employment Corridor to be effectively managed, based on the following principles.

- *Stage the release of land to match demand;*
- *Maximise the diversity of investment and employment through land supply;*
- *Stimulate demand by creating a critical mass of activity and development in consolidated nodes to attract additional investment; and*
- *Ensure future planning accommodates the changing needs of industry and community, as demand for different employment land types evolves.*

The local context presents clear challenges for effective delivery of the vision for the Precinct and CREP specifies that *“the scale of the Cardinia Employment Corridor requires the release of employment land to be carefully managed, balancing supply with demand.”* To establish a successful and concentrated ‘core’ of activity, demand must be directed into the Precinct, maximising its attractiveness to additional investment. Most importantly, CREP states that *“to achieve a critical mass of development in the Precinct, the release of additional land in the Cardinia Employment Corridor should be discouraged until the commercial area within the Precinct has significantly established. The dispersal of investment will otherwise impact upon land uptake rates within the Precinct, adversely affecting the timing and density of jobs.”*

The vision for CREP was for it to be the ‘hub’ of this employment corridor, and therefore critical mass should be confirmed in CREP before further employment land in the corridor is released. There have been no material changes to the planning or policy for this corridor since its publication in 2010 and in accordance with the policy, Cardinia Shire Council should wait for CREP to become more established and fulfil its purpose as the long-term plan for the Officer – Pakenham Corridor.

Implications

- The CREP contains 353.07 net employment hectares, which is over and above the anticipated employment land demand of 188.3ha through 2041 for the Shire according to the SGS report.
- In fact, at the MICLUP take-up rates for industrial land of approximately 13.9ha per annum, the CREP alone contains enough employment land to meet demand for over 25 years.

- The development of this Precinct is just underway, with zero employment land take-up to date.

2.7 Officer South Employment Precinct Structure Plan (currently being prepared by the Victorian Planning Authority)

The Victorian Planning Authority (VPA) is currently leading the preparation of a structure plan for the Officer South Employment Precinct, working in partnership with Cardinia Shire Council, State government agencies and service authorities.

The VPA have proposed a number of emerging key themes to form the basis of a vision for the PSP:

- Providing for employment and industries of the future
- Improving existing conditions
- Releasing key transport/economic links
- Integrating complementary community and open space assets
- Understand sustainable environmental and drainage needs
- Industry ready services and infrastructure

The Precinct covers an area of approximately 1,069ha, the substantial majority of which will be dedicated to employment uses.

Implications

- The Officer South Precinct will follow CREP in supplying significant additional commercial and industrial employment land in Cardinia Shire.
- The development of the Cardinia Road and Officer South Precincts will provide sufficient supply of employment land to meet forecast demand in the Officer-Pakenham Corridor for many years to come.

3.0 Key Issues

Parklea do not support the progression of this PSP on the basis that there is no strategic justification in terms of a supply and demand assessment for employment land, which demonstrates the need for the Pakenham South Employment Precinct at this time. Despite no material changes to the planning or policy of this corridor since CREP, the Officer South Employment PSP is also progressing, when additional industrial land supply is not yet required.

In our view it is premature for Council to proceed with Amendment C265 to the Cardinia Planning Scheme, having regard for the following.

3.1 CREP as the Employment Hub of the Officer – Pakenham Corridor

The development of further industrial land in the Pakenham South area would greatly undermine the viability of the planned Cardinia Road Employment Precinct (CREP) as the employment hub of the Officer – Pakenham Industrial/Business Corridor. To establish a successful and concentrated ‘core’ of activity, demand must be directed into CREP, maximising its attractiveness to additional investment. CREP recommends that to achieve a critical mass of development, the release of additional land in the corridor should not occur until the Precinct has significantly established, to avoid the dispersal of investment.

As urban development and associated population growth proceeds over time in the Pakenham-Officer Corridor, demand for employment land will also expand. However, such expansion at this time is not warranted and, moreover, is not supported by a market demand and supply assessment.

While the SGS report provides a detailed assessment of employment land demand, in our review of the report we conclude that it does not contain adequate consideration of employment land supply factors in Cardinia Shire. The supply of employment land will be available in the Officer Employment PSP Area and in the two Cardinia Road Employment PSP Areas, with these areas located closer to both the established and expanding metropolitan areas where businesses tend to prefer to locate due to access to related infrastructure, services, inter-industry links, customers, and workforce.

3.2 Premature Release of Additional Employment Land

The SGS report was prepared in August 2019, and in our view the data presented in the report has currency in 2020. Existing provision of zoned and yet-to-be-zoned employment land in Pakenham-Officer SSIP has “*more than 100 years of available employment land*” based on approximately 1,300ha of zoned land, a plot ratio of 80% and current take-up rates. On this basis, the current timing of the preparation of the Pakenham South employment precinct structure plan is a matter of concern, having regard for likely oversupply of employment land in the Shire.

The PSEP could account for the equivalent of 78% of all employment land demand by 2041, this statistic highlights the significant extent of the PSEP area in the overall context of employment land demand in the Shire. SGS data at Table 2 (p.16) shows that the Pakenham-Officer SSIP has 291.9ha of occupied land with total available supply (zoned and unzoned) of employment land of 1,594.9ha, or 18.3% of total supply in the SSIP. Thus, a significant area of employment land is available in the Shire, both now (zoned) and in the near terms as more employment land is zoned, as anticipated.

The existing supply of un-occupied zoned and unzoned employment land in the Pakenham-Officer SSIP is significant (1,303ha, SGS, p.16), and this employment land supply is estimated by SGS to meet demand for 100-plus years. The forecast level of demand for employment land to 2041 (188.8ha, SGS p.40) accounts for only 18% of zoned and unzoned land in the Pakenham-Officer SSIP in 2016 (as estimated at 1,040ha of developable land, based on the 2017 UDP).

The SGS report highlights that the Pakenham South Employment Precinct is in a region which has “*a significant quantity of vacant employment land*”, absorption rates have been slow, and the locality is located far from the Port of Melbourne and Melbourne Airport. Regardless of employment land supply (existing or planned) in the PSEP, in many cases the marketplace will likely seek out employment land that is located closer to the metropolitan centre of Melbourne and important facilities and services, and the CREP and Officer South Precincts are better placed to support these market preferences.

3.3 CREP v Pakenham South PSP Planning Controls

It is understood that the application of the Industrial 1 Zone (IN1Z) is proposed for the Pakenham South PSP through Schedule 6 to the UGZ. This is in contrast to the Urban Growth Zone – Schedule 2 (UGZ2) which is applied to the CREP, a similar employment Precinct with a mix of industrial and commercial land.

The tables below summarise the land use provisions for the IN1Z and the UGZ2 in the Cardinia Planning Scheme. There are a number of differences between the two Zones; overall, the UGZ2 is a more complex Zone with prescriptive conditions applied, and standard IN1Z provides more flexibility. The differing Zones would likely give the Pakenham South Precinct a competitive advantage, more easily attracting businesses and investors due to a clearer and more flexible set of planning controls. This is contrary to established Cardinia Shire policy which identifies the CREP as the hub of the corridor, and which specifies that CREP be periodically reviewed to ensure current controls are appropriate for the Precinct.

It is noted that the summary provided below highlights employment uses, and the conditions that are applied under each zone.

CREP – UGZ2 (underline added)

USE PROVISIONS		CONDITION(S)
As-of-Right Uses (Section 1)	Food and drink premises (other than Hotel and Tavern)	<u>Must be located within the Activity Centre as shown in Plan 1.</u>
	Dwelling (other than Bed and breakfast and Caretaker's house)	Must be located within an area designated as residential land in Plan 1 or the Activity Centre. Dwellings within the Activity Centre must be located on upper storeys and must have dedicated access independent of other uses. Any frontage at ground floor level must not exceed 4 metres
	Industry (other than Materials recycling, Refuse disposal, Refuse transfer station, Research and development centre, Rural industry, and Service industry)	<p>Must be located in an area shown as Service Business or Industrial in Plan 1.</p> <p>Must be located at least the following distances from land (not a road) designated for residential use in Plan 1 or shown as Activity Centre or Commercial:</p> <ul style="list-style-type: none"> The threshold distance, for a purpose listed in the table to Clause 52.10. 30 metres, for a purpose not listed in the table to Clause 52.10. <p>Must not adversely affect the amenity of the neighbourhood, including through the:</p> <p>Transport of materials, goods or commodities to or from the land. Appearance of any stored goods or materials.</p> <p>Emission of noise, artificial light, vibration, odour, fumes, smoke, vapour, steam, soot, ash, dust, waste water, waste products, grit or oil.</p>
	Manufacturing sales	Must be located in an area shown as Industrial in Plan 1.
	Minor utility installation	
	Natural systems	
	Office	<p>Must be located in an area designated as employment land in Plan 1.</p> <p>Within the Activity Centre, the gross leasable floor area for any tenancy must not exceed 1000 square metres. Any frontage at ground floor level on any street must not exceed 2 metres, unless the office is a bank, real estate agency, travel agency or any other office where the floor space adjoining the frontage is a customer service area accessible to the public.</p> <p><u>Within the Service Business area and the Industrial area, the office must be in conjunction with another use.</u></p>
	Postal agency	<u>Must be located within the Activity Centre as shown in Plan 1.</u>
	Research centre	Must be located in an area shown as Industrial in Plan 1.
	Shop (other than Adult sex bookshop, Department store, Restricted retail premises)	Must be located within the Activity Centre as shown in Plan 1. The floor area of any shop must not exceed 3500 square metres leasable floor area.

	USE PROVISIONS	CONDITION(S)
	Warehouse (other than Shipping container storage and Fuel depot)	<u>Must be located in an area shown as Industrial in Plan 1.</u>
Permit Required Uses (Section 2)	Display home	Must be located within an area designated as residential land in Plan 1.
	Dry cleaner	Must be located in an area shown in Plan 1 as: <ul style="list-style-type: none"> • <u>Activity Centre and the leasable floor area must not exceed 400 square metres;</u> • <u>or Industrial.</u>
	Exhibition centre	<u>Must be located within an area shown as Commercial in Plan 1, or within the Activity Centre adjacent to an arterial road.</u>
	Hospital	<u>Must be located in an area shown as Commercial in Plan 1.</u>
	Industry (other than Materials recycling, Refuse disposal, Refuse transfer station, Research and development centre, Rural industry, and Service industry) – where the Section 1 condition is not met	<u>Must be located in an area shown as Service Business or Industrial in Plan 1.</u>
	Land sales centre	The permit must specify an expiry date of five years from the date the permit is issued.
	Office - if the Section 1 condition is not met	<u>Must be located within the Activity Centre as shown in Plan 1.</u>
	Renewable energy facility	Must be located in an area designated as employment land in Plan 1. When located in an area shown as Activity Centre, Commercial, or Service Business, must be in conjunction with another use.
	Research and development centre - if the Section 1 condition is not met	<u>Must be located in an area shown as Commercial or Service Business in Plan 1.</u>
	Residential hotel	Must be located in an area shown as Commercial or High Density Residential 2 in Plan 1.
	Restaurant - if the Section 1 condition is not met	Must be located in an area shown in Plan 1 as: <ul style="list-style-type: none"> • Commercial when in conjunction with another use; • Service Business; • or Industrial.
	Restricted place of assembly	Must be located in an area shown as Commercial in Plan 1 and be in conjunction with an office.

USE PROVISIONS	CONDITION(S)
Restricted recreation facility	Must be located within an area shown in Plan 1 as: Activity Centre, at an upper storey; or Commercial and be in conjunction with an office, residential hotel or education centre.
Restricted retail premises	<u>Must be located in an area shown in Plan 1 as:</u> <ul style="list-style-type: none"> • <u>Activity Centre;</u> • <u>Commercial; or</u> • <u>Service Business and be:</u> • <u>automotive parts and accessories;</u> • <u>equestrian supplies;</u> • <u>or swimming pools</u>
Retail premises (other than Food and drink premises, Market, Motor vehicle, boat and caravan sales, Postal agency, Primary Produce Sales, Trade supplies and Shop)	<u>Must be located in an area shown as Service Business in Plan 1.</u>
Service station	Must be located in the Activity Centre as shown in Plan 1 or be located with frontage to an arterial road in areas shown as Industrial or Service Business.
Shop (other than Adult sex bookshop, Convenience shop, Department store, Restricted retail premises) - if the Section 1 condition is not met	Must be in conjunction with a residential hotel or office and be in an area shown as Commercial on Plan 1.
Takeaway food premises - if the Section 1 condition is not met	Must be located within an area shown as Service Business or Industrial and adjacent to open space.
Trade supplies	Must be located in an area shown as Service Business or Industrial in Plan 1.
Utility installation (other than Minor utility installation and Telecommunications facility)	Any gas holder, or sewerage or refuse treatment or disposal works, must be at least 30 metres from land (not a road) which is designated for residential use in Plan 1, or shown as Activity Centre or Commercial.
Warehouse (other than shipping container storage and fuel depot) if the Section 1 condition is not met	<u>Must be located within an area shown in Plan 1 as Service Business and be in conjunction with an office.</u>

	USE PROVISIONS	CONDITION(S)
Prohibited Uses (Section 3)	<p>Accommodation (other than Bed & Breakfast, Dwelling, Nurses home, Residential college, Residential hotel)</p> <p>Agriculture</p> <p>Cinema based entertainment facility</p> <p>Extractive Industry</p> <p>Leisure and recreation (other than Indoor recreation facility, Informal outdoor recreation, Restricted recreation facility)</p> <p>Place of assembly (other than Amusement parlour, Exhibition centre, Function centre, Hall, Library, Nightclub, Restricted Place of Assembly)</p> <p>Saleyard</p> <p>Winery</p> <p>Any use in Section 2 where the condition is not met</p>	
Additional Use Provisions	<p>Use of land must be generally in accordance with the Cardinia Road PSP, and must not detrimentally affect the amenity of the neighbourhood, including through the:</p> <ul style="list-style-type: none"> • Transport of materials or goods to or from the land. • Traffic generated by the use. • Appearance of any buildings, works or materials. • Emissions from the use. 	

Pakenham South – IN1Z (Proposed)

	USE PROVISIONS	CONDITION(S)
As-of-Right Uses (Section 1)	<p>Convenience shop</p> <p>Crop raising</p> <p>Grazing animal production</p> <p>Home based business</p>	
	<p>Industry (other than Materials recycling and Transfer station)</p>	<p>Must not be a purpose listed in the table to Clause 53.10 with no threshold distance specified.</p> <p>The land must be at least the following distances from land (not a road) which is in an Activity Centre Zone, Capital City Zone, Commercial 1 Zone, Docklands Zone, residential zone or Rural Living Zone, land used for a hospital, an education centre or a corrective institution or land in a Public Acquisition Overlay to be acquired for a hospital, an education centre or a corrective institution:</p> <ul style="list-style-type: none"> • The threshold distance, for a purpose listed in the table to Clause 53.10.

USE PROVISIONS	CONDITION(S)
	<ul style="list-style-type: none"> 30 metres, for a purpose not listed in the table to Clause 53.10. <p>Must not:</p> <ul style="list-style-type: none"> Exceed a fire protection quantity under the Dangerous Goods (Storage and Handling) Regulations 2012. Require a notification under the Occupational Health and Safety Regulations 2017. Require a licence under the Dangerous Goods (Explosives) Regulations 2011. Require a licence under the Dangerous Goods (HCDG) Regulations 2016. <p>Must not adversely affect the amenity of the neighbourhood, including through the:</p> <ul style="list-style-type: none"> Transport of materials, goods or commodities to or from the land. Appearance of any stored goods or materials. Emission of noise, artificial light, vibration, odour, fumes, smoke, vapour, steam, soot, ash, dust, waste water, waste products, grit or oil.
Service station	<p>The land must be at least 30 metres from land (not a road) which is in an Activity Centre Zone, Capital City Zone, Commercial 1 Zone, Docklands Zone, residential zone or Rural Living Zone, land used for a hospital, an education centre or a corrective institution or land in a Public Acquisition Overlay to be acquired for a hospital, an education centre or a corrective institution.</p> <p>Must not adversely affect the amenity of the neighbourhood, including through the:</p> <ul style="list-style-type: none"> Transport of materials, goods or commodities to or from the land. Appearance of any stored goods or materials. Emission of noise, artificial light, vibration, odour, fumes, smoke, vapour, steam, soot, ash, dust, waste water, waste products, grit or oil.

USE PROVISIONS	CONDITION(S)
Shipping container storage	<p>Must not be a purpose listed in the table to Clause 53.10 with no threshold distance specified.</p> <p>The land must be at least the following distances from land (not a road) which is in an Activity Centre Zone, Capital City Zone, Commercial 1 Zone, Docklands Zone, residential zone or Rural Living Zone, land used for a hospital, an education centre or a corrective institution or land in a Public Acquisition Overlay to be acquired for a hospital, an education centre or a corrective institution:</p> <ul style="list-style-type: none"> • The threshold distance, for a purpose listed in the table to Clause 53.10. • 100 metres, for a purpose not listed in the table to Clause 53.10. <p>Must not:</p> <ul style="list-style-type: none"> • Exceed a fire protection quantity under the Dangerous Goods (Storage and Handling) Regulations 2012. • Require a notification under the Occupational Health and Safety Regulations 2017. • Require a licence under the Dangerous Goods (Explosives) Regulations 2011. • Require a licence under the Dangerous Goods (HCDG) Regulations 2016. <p>The site must adjoin, or have access to, a road in a Road Zone.</p> <p>Shipping containers must be setback at least 9 metres from a road in a Road Zone.</p> <p>The height of shipping container stacks must not exceed 6 containers or 16 metres, whichever is the lesser.</p> <p>Must not adversely affect the amenity of the neighbourhood, including through the:</p> <ul style="list-style-type: none"> • Transport of materials, goods or commodities to or from the land. • Appearance of any stored goods or materials. • Emission of noise, artificial light, vibration, odour, fumes, smoke, vapour, steam, soot, ash, dust, waste water, waste products, grit or oil.
Take away food premises	
Warehouse (other than Mail centre and Shipping container storage)	<p>The land must be at least the following distances from land (not a road) which is in an Activity Centre Zone, Capital City Zone, Commercial 1 Zone, Docklands Zone, residential zone or Rural Living Zone, land used for a hospital, an education centre or a corrective institution or land in a Public Acquisition Overlay to be acquired for a hospital, an education centre or a corrective institution:</p> <ul style="list-style-type: none"> • The threshold distance, for a purpose listed in the table to Clause 53.10. • 30 metres, for a purpose not listed in the table to Clause 53.10.

USE PROVISIONS	CONDITION(S)
	<p>Must not:</p> <ul style="list-style-type: none"> Exceed a fire protection quantity under the Dangerous Goods (Storage and Handling) Regulations 2012. Require a notification under the Occupational Health and Safety Regulations 2017. Require a licence under the Dangerous Goods (Explosives) Regulations 2011. Require a licence under Dangerous Goods (HCDG) Regulations 2016. <p>Must not adversely affect the amenity of the neighbourhood, including through the:</p> <ul style="list-style-type: none"> Transport of materials, goods or commodities to or from the land. Appearance of any stored goods or materials. Emission of noise, artificial light, vibration, odour, fumes, smoke, vapour, steam, soot, ash, dust, waste water, waste products, grit or oil
Agriculture (other than Apiculture, Crop raising, Grazing animal production, Intensive animal production, Pig farm and Poultry farm)	
Education Centre	Must not be a primary or secondary school.
Materials recycling	The land must be at least 30 metres from land (not a road) which is in an Activity Centre Zone, Capital City Zone, Commercial 1 Zone, Docklands Zone, residential zone or Rural Living Zone or land used for a hospital, an education centre or a corrective institution or land in a Public Acquisition Overlay to be acquired for a hospital, an education centre or a corrective institution.
Office	The leasable floor area must not exceed the amount specified in the schedule to this zone.
Place of assembly (other than Carnival, Cinema based entertainment facility and Circus) Restricted retail premises Retail premises (other than Shop and Take away food premises)	
Utility installation (other than Minor utility installation and Telecommunications facility)	Any gas holder, or sewerage or refuse treatment or disposal works, must be at least 30 metres from land (not a road) which is in an Activity Centre Zone, Capital City Zone, Commercial 1 Zone, Docklands Zone, residential zone or Rural Living Zone, land used for a hospital, an education centre or a corrective institution or land in a Public Acquisition Overlay to be acquired for a hospital, an education centre or a corrective institution.

USE PROVISIONS		CONDITION(S)
Prohibited Uses (Section 3)	Accommodation (other than Caretaker's house) Cinema based entertainment facility Hospital Intensive animal production Pig farm Poultry farm Shop (other than Adult sex product shop, Convenience shop and Restricted retail premises)	
Additional Use Provisions	None	

4.0 Conclusion

We thank Cardinia Shire Council for the opportunity to collaborate in planning for the Pakenham South Employment Precinct and trust that this submission will be duly considered, and all matters will be addressed.

Appendix A – Peer Review: Pakenham South Employment Precinct Structure Plan – Economic Assessment (SGS Economics and Planning, August 2019)

26 November 2020

Project No. 3190171

Don Welsh
Parklea Developments
Level 1/4 Cardinia Road
Officer VIC 3809

Dear Don ,

Re: Pakenham South Employment Precinct Structure Plan – Economic Assessment (SGS Economics & Planning, August 2019)

As part of our submission to Cardinia Shire Council in respect to the Pakenham South Employment Precinct Structure Plan, Ethos Urban has undertaken a peer review of an economic assessment undertaken by SGS Economics & Planning on behalf of the Cardinia Shire Council. Our review is presented in this letter.

1 Summary of the Pakenham South PSP Economic Assessment

An economic assessment of the Pakenham South Employment Precinct (PSEP) was undertaken by SGS Economics & Planning in August 2019 for the purpose of assisting Council with the preparation of the Pakenham South Employment Precinct Structure Plan.

The PSEP is located in Melbourne's South East Growth Corridor and has an area of approximately 185ha. The precinct is described by SGS as *"a major economic and employment node for the rapidly growing South East Corridor"* and that the employment role of the precinct *"is critical to supporting local employment opportunities into the long term"* (p.iii).

In essence the economic assessment provides a review of the PSEP, location and hierarchy relevant to the current and planned future provision of land in the surrounding area of the South East Growth Corridor Plan. Aspects covered in the report include, among others, identification of the type and number of jobs required to serve the PSEP, indicative job densities for the precinct, land area requirements by employment type, and implications for surrounding existing or planned employment areas (p.1).

The report also highlights that the PSEP is situated in the Pakenham-Officer State Significant Industrial Precinct (SSIP), which is one of five such precincts in metropolitan Melbourne (p.2). Furthermore, the PSEP forms part of the larger employment area described as the Pakenham Employment Area which comprises the South East Business Park (168ha), Livestock Exchange (110ha), and Pakenham South Employment (185ha).

Importantly, the report highlights that the Southern SSIP, located in and around Dandenong South, *"is approaching exhaustion, with the remaining land being taken up rapidly"* and that, in this context, the Pakenham-Officer SSIP *"contains the greatest quantity of vacant employment land in the South East region"* (p.15).

The report acknowledges that the Pakenham-Officer SSIP has *"significant existing capacity"* in regard to employment land and that the total available zoned industrial land is around 1,300ha and represents more than 100 years of available employment land (p.16).

Other PSP areas in Cardinia Shire comprise the Cardinia Road Employment PSP and the Officer Employment PSP.

Development potential in the Pakenham-Officer SSIP is identified in the report as being at *"an early stage of change and development"* and that the Urban Development Program (2017) shows a total of *"just over 1,300 hectares of gross employment land supply"* (p.36). Taking into account that not all of the existing land will be developed (allowing for

roads, footpaths, open space, etc), SGS estimates that the actual quantity of developable land at the Pakenham-Officer SSIP is likely to be approximately 1,040ha or 80% of total land area (p.36).

Having regard for existing and planned employment areas, the report estimates that between 2016 and 2041 the requirement for employment land in Cardinia Shire “*will rise to 188.3 hectares – equivalent to around 20 per cent of zoned and unzoned land in 2016 (as estimated in the 2017 UDP)*” (p.40). According to SGS, the Pakenham South Precinct has a total land area of 184.36ha (gross). Discounting this area by 20% to allow for roads, etc, SGS estimates that the net developable area totals 147.5ha (p.43). It is therefore evident that the Pakenham South PSP employment land could accommodate 78% of employment land demand in the Cardinia Shire to 2041 (147.5ha/188.3ha). Thus, the land employment area involved in the Pakenham South PSP is significant in terms of overall employment land supply in the Shire.

The SGS report provides three potential development scenarios for the PSEP which comprise the following:

- Option 1: Fostering the growth of an employment precinct with some externality-generating activities
- Option 2: Prioritising the establishment of externality-generating business
- Option 3: Establishing an industrial precinct with an optimally-located commercial centre.

SGS recommended Option 3 as the preferred development option for the PSEP, comprising the Industrial 1 Zone, together with a small area of retail floorspace. As stated by SGS, “*the Industrial 1 Zone is able to accommodate the vast majority of uses that are likely to locate in that part of the Shire*” (p.56). Under this scenario, approximately 3,720 workers would be employed in the PSEP once the area is operational (p54).

Of interest, the report provides a SWOT analysis (p.31) which includes the following Weaknesses:

- The precinct is located in a region which has “*a significant quantity of vacant employment land*”
- “*Absorption in recent times has been slow, though rates are likely to pick up for a range of reasons*”
- “*The precinct is relatively poorly located in relation to the Port of Melbourne and Melbourne Airport*”.

Two Threats in particular are noted (p.32), namely:

- The (now decided) location of Melbourne’s second container port to be located to the south-west of Melbourne (and not in Melbourne’s south-east); and
- The potential non-delivery of Melbourne’s second international airport in the south-eastern region.

The Strengths and Opportunities associated with the precinct (p.31) relate to:

- Good access to key arterial roads,
- Precinct is surrounded by either employment land or green wedge-zoned land (limited impact on sensitive uses),
- Relatively flat land with limited flora and fauna onsite,
- Significant worker catchment, close to eastern Victoria producer regions, and (among other advantages),
- Accessibility to infrastructure.

2 Our Commentary on the SGS Report

We make the following comments regarding the SGS report and the requirements for employment land in the Pakenham South Precinct:

1. The SGS report was prepared in August 2019. Data presented in the report applies to various years, with *Table 2: Supply and Take-Up of Industrial Land, State Significant Industrial Precincts* based on data sourced from the Urban Development Program 2017. We have referenced the *Melbourne Industrial and Commercial Land Use Plan* (DELWP, 2020) for more recent data, as presented at paragraph 8, below.

2. The SGS report shows that the existing (as presented by SGS) provision of zoned and yet-to-be-zoned employment land in Pakenham-Officer SSIP has “*more than 100 years of available employment land*” (SGS, p.16) based on approximately 1,300ha of zoned land, a plot ratio of 80% and current take-up rates. On this basis, the current timing of the preparation of the Pakenham South employment precinct structure plan is a matter of concern, having regard for likely oversupply of employment land in the Shire.
3. The PSEP could account for the equivalent of 78% of all employment land demand by 2041, as noted above – this statistic highlights the significant extent of the PSEP area in the overall context of employment land demand in the Shire.
4. SGS data at Table 2 (p.16) shows that the Pakenham-Officer SSIP has 291.9ha of occupied land with total available supply (zoned and unzoned) of employment land of 1,594.9ha, or 18.3% of total supply in the SSIP (291.9ha/1,594.9ha). Thus, a significant area of employment land is available in the Shire, both now (zoned) and in the near terms as more employment land is zoned, as anticipated.
5. The SGS report (as noted above) highlights that precinct is located in a region which has “*a significant quantity of vacant employment land*”, absorption rates have been slow, and the locality is located far from the Port of Melbourne and Melbourne Airport.
6. Regardless of employment land supply (existing or planned) in the PSEP, in many cases the marketplace will likely seek out employment land that is located closer to the metropolitan centre of Melbourne and important facilities and services (and noted in (5) above).
7. While the SGS report provides a detailed assessment of employment land demand, in our review of the report we conclude that it does not contain adequate consideration of employment land supply factors in Cardinia Shire.
8. As noted at paragraph 1 above, more recent data is now available from the *Melbourne Industrial and Commercial Land Use Plan* (DELWP, 2020) compared with the data presented in the earlier SGS report (at SGS, Table 2, 2019). The MICLUP data (source: Table 27, p88) shows that the Officer-Pakenham SSIP has the following features in terms of industrial land supply and demand:
 - Zoned Occupied Land: 317.7ha
 - Zoned Vacant Land: 323.8ha
 - Future Supply: 938.3ha
 - Total Available Supply: 1,262.1ha

On this basis, the Officer-Pakenham SSIP has occupied land equivalent to 25.7% of total available supply (323.8ha/1,262.1ha). Thus, considerable land is available for development in coming years (as also concluded in the earlier SGS report). MICLUP (Table 28, p89) shows that the take-up rate for industrial land in 2017/18 was 13.9ha per year and on this basis industrial land supply approximates 91 years (1,262.1ha/13.9ha). This data also approximates the SGS conclusion at paragraph 2 above.

3 Summary

In our view it is premature for Council to proceed with Amendment C265 to the Cardinia Planning Scheme, having regard for the following:

- No strategic support in terms of a supply and demand assessment for employment land is available which demonstrates the appropriateness of the need for the Pakenham South Employment Precinct at this time.
- The existing supply of un-occupied zoned and unzoned employment land in the Pakenham-Officer corridor is significant (1,303ha, SGS, p.16), and this employment land supply is estimated by SGS to meet demand for 100-plus years. Our update of more recent sourced data from MICLUP indicates that a land supply of 91 years is available in terms of existing zoned land and future supply (MICLUP, Tables 27 and 28).

- The forecast level of demand for employment land to 2041 (188.8ha, SGS p.40) accounts for only 18% of zoned and unzoned land in the Pakenham-Officer SSIP in 2016 (as estimated at 1,040ha of developable land, based on the 2017 UDP).
- The situation whereby the supply of employment land will be available in the Officer Employment PSP Area and in the Cardinia Road Employment PSP, with these areas located closer to both the established and expanding metropolitan areas where businesses tend to prefer to locate due to access to related infrastructure, services, inter-industry links, customers, and workforce. Of course, as urban development and associated population growth proceeds over time in the Pakenham-Officer corridor, demand for employment land will also expand. However, such expansion at this time is not warranted and, moreover, is not supported by a market demand and supply assessment.

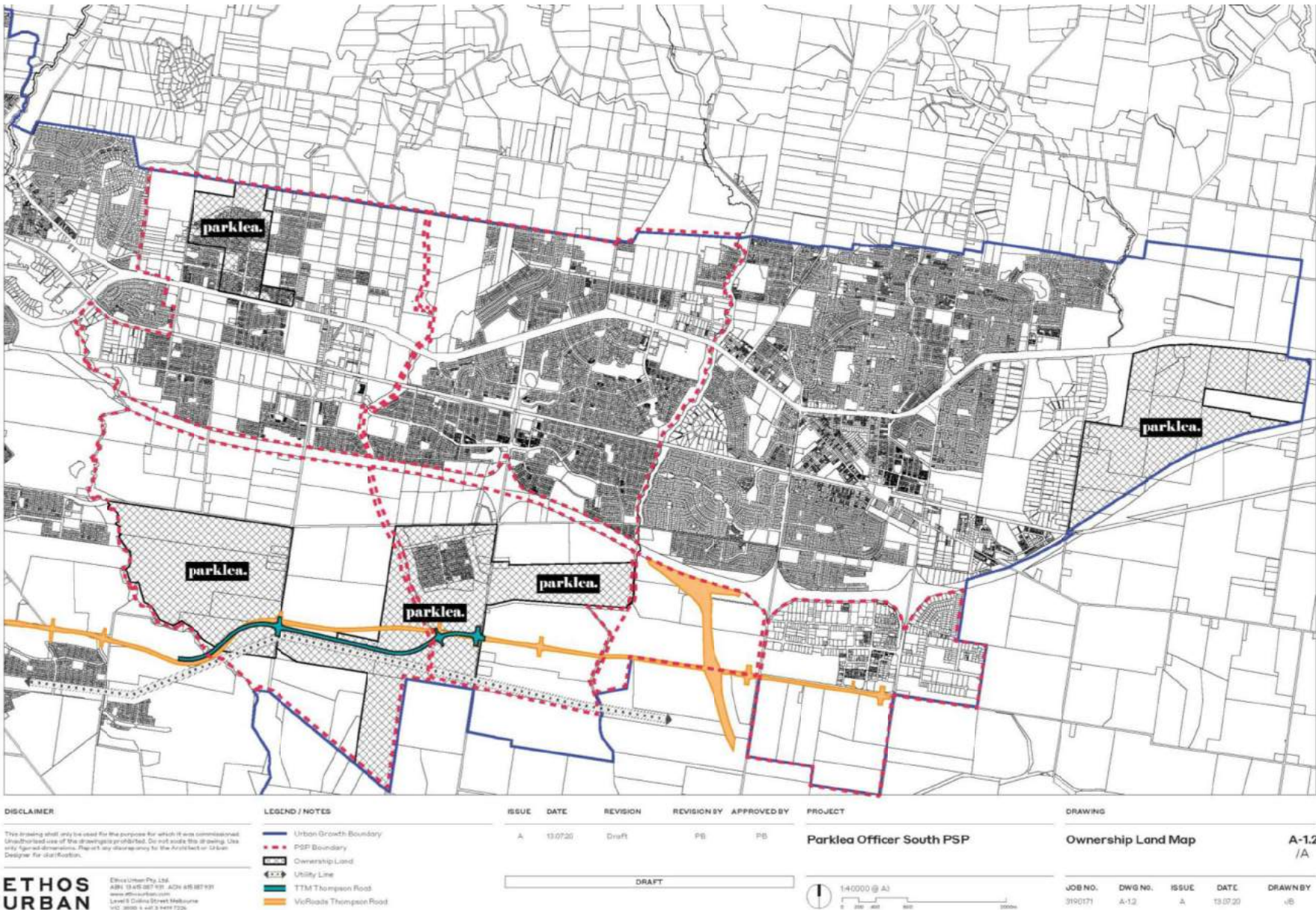
If you require anything further, please contact John Henshall (0409 324 779) of this office.

Yours sincerely,



John Henshall
Director, Economics
0409 324 779
jhenshall@ethosurban.com

Appendix B – Parklea Landholdings





Department of Transport

Metropolitan South East Region
12 Lakeside Drive
Burwood East
Victoria 3151

Mr Luke Connell
Manager Policy, Design and Growth Area Planning
Cardinia Shire Council (Strategic Growth Area Planning)
Amendment C265
PO Box 7
Pakenham Vic 3810

Dear Mr Connell

CARDINIA PLANNING SCHEME AMENDMENT C265

I refer to your letter dated 9 October 2020, referring to the preparation of Amendment C265 to the Cardinia Planning Scheme to implement the Pakenham South Employment Precinct Structure Plan (PSP).

The Department of Transport (DoT) through the Metro South East Region has prepared its response following a review of the Precinct Structure Plan and related documentation. DoT supports the intended vision for the precinct and is keen to work with the Shire of Cardinia to ensure the transport network effectively supports its future development.

From its review of the Precinct Structure Plan, DoT is particularly supportive of the following objectives:

- O15: Provide a high-amenity, low speed and permeable local road network that prioritises community access and safety;
- O16: Ensure the road network is appropriately designed to accommodate freight movements including high productivity vehicles;
- O17: Promote public transport movements by providing a bus capable road network that services key destinations throughout the precinct, particularly the local convenience centre;
- O18: Establish an integrated and permeable transport network to encourage public transport, walking and cycling, reduced car dependency and safety and connectivity for all road users.

DoT considers that the requirements outlined under the following sections are appropriate:

- 3.4.1 - Street network
- 3.4.2 - Public transport
- 3.4.3 - Walking and cycling

Comments on items to be addressed in the Amendment and background documents are included in Attachment A. The following section outlines recommended changes to the Amendment to address the items raised and any additional corrections.

Recommended changes to the Amendment

Pakenham South Employment PSP October 2020 Incorporated Document

1. Add the following sentence to R33 (p33): *“Access to internal roads must be limited to the proposed intersections along Greenhills Road.”*
2. Swap labels RD-01 and RD-02 on *Plan 13 Precinct Infrastructure Plan* (p42) to correctly reflect the project descriptions in *Table 4 Precinct Infrastructure* (p46).
3. Change the cross-section for Greenhills Road in Appendix C (page 56) to:
 - a. Include *“(38.5m at bus stop locations)”* below *“34m ROAD RESERVE”*; and
 - b. Include *“(12m at bus stop locations)”* below *“7.5m VERGE”*
4. In Table 3.7 Precinct Infrastructure (p46), change all existing references to *“VicRoads”* to *“Department of Transport”*.
5. In Section 3.4.2 Public transport, requirement R36, change *“Transport for Victoria”* to *“the Department of Transport”*.

Schedule 6 to Clause 37.07 Urban Growth Zone

6. Under Section 3.0 Application requirements, Subdivision and/or development, final point, change *“VicRoads”* to *“the Head, Transport for Victoria”*.
7. Under Section 4.0 Conditions and requirements for permits, Conditions - Public Transport on Greenhills Road, first point, change *“Department of Transport”* to *“Head, Transport for Victoria”*.

Traffic Impact Assessment Report

8. Update the concept plans to include the pedestrian crossing proposed in front of the Local Convenience Centre on Greenhills Road, as indicated in the PSP (p12).
9. Add indented bus stops on the south side of Greenhills Road to generally mirror the bus stops on the north side of the road.

'Windarra', 40 Greenhills Road Pakenham, Statement of Significance, September 2020

10. Change *Figure 1: Detail of curtilage for HO14* to show the northern boundary of the proposed curtilage along the proposed southern boundary of Greenhills Road in lieu of the existing southern boundary.

'Windarra', 40 Greenhills Road Pakenham, Incorporated Plan - Permit Exemptions, September 2020

11. Change *Figure 1: Detail of curtilage for HO14* to show the northern boundary of the proposed curtilage along the proposed southern boundary of Greenhills Road in lieu of the existing southern boundary.
12. Change the proposed amendment to Map 16HO to show the reduced curtilage of HO14.

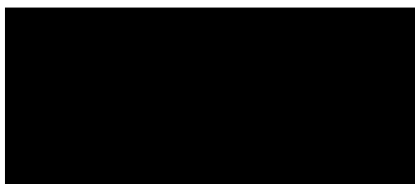
Schedule to Clause 66.04 Referral of Permit Applications Under Local Provisions

13. Change Clause 66.04 to include the following additions:

Clause 36.04-1 and 36.04-2	A permit to use land in a Road Zone or to construct a building or construct or carry out works in a Road Zone for a Section 2 use if the road is identified as a future arterial road in an approved Precinct Structure Plan	Head, Transport for Victoria	Recommending Referral Authority
Clause 52.05	A permit to put up for display an electronic or animated sign within 60m of a road if the road is identified as a future arterial road in an approved Precinct Structure Plan	Head, Transport for Victoria	Recommending Referral Authority
Clause 52.29	A permit to: Create or alter access to a road in a Road Zone, Category 1 or land in a Public Acquisition Overlay if the purpose of acquisition is for a Category 1 road and to subdivide land adjacent to a road in a Road Zone, Category 1 or land in a Public Acquisition Overlay if the purpose of acquisition is for a Category 1 road if the road is identified in an approved precinct structure plan as a future arterial road	Head, Transport for Victoria	Recommending Referral Authority

Should you have any enquiries regarding this submission, please contact [REDACTED], Senior Strategic Transport Planner [REDACTED].

Yours sincerely



Manager Network Planning Integration

26 / 11 / 2020

ATTACHMENT 1 – Items to be addressed in the Amendment

Background documents

Traffic Impact Assessment (Traffic Works – 11/08/2020)

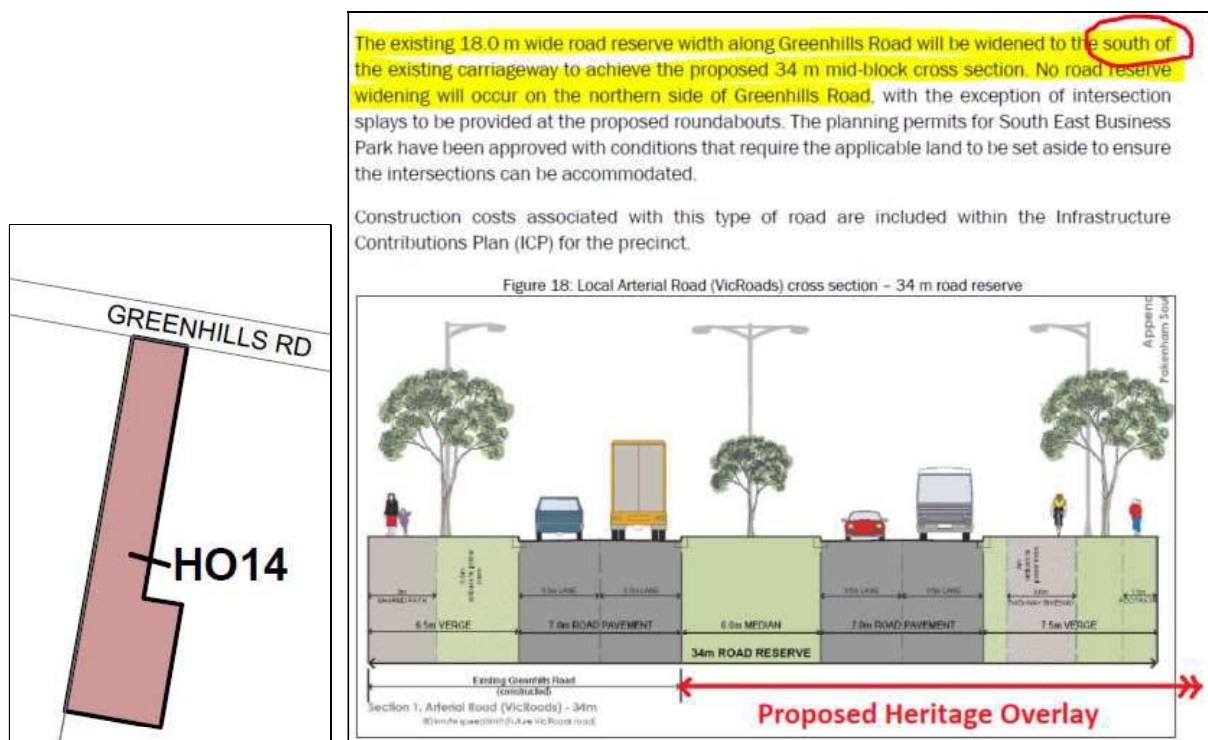
Functional Layout Plans in Attachment C are not consistent with PSP cross-section for Greenhills Road:

- Plans do not show separate bicycle and pedestrian paths
- Modifications to intersections may be required to accommodate separated paths or a wider shared path through traffic islands

Function Layout Plans do not show indented bus bays and hard stand areas on the south side of Greenhills Road. Additional road widening of approx. 4.5m will be required at bus stop locations as proposed verge width is inadequate to accommodate indented bus bay, hardstand area, bicycle path and pedestrian path with suitable clearances.

Post-contact Heritage Assessment (Context – 23/01/2020)

Proposed HO map shows HO extending to existing road boundary, whereas the Greenhills Road right-of-way is proposed be widened on the south side.



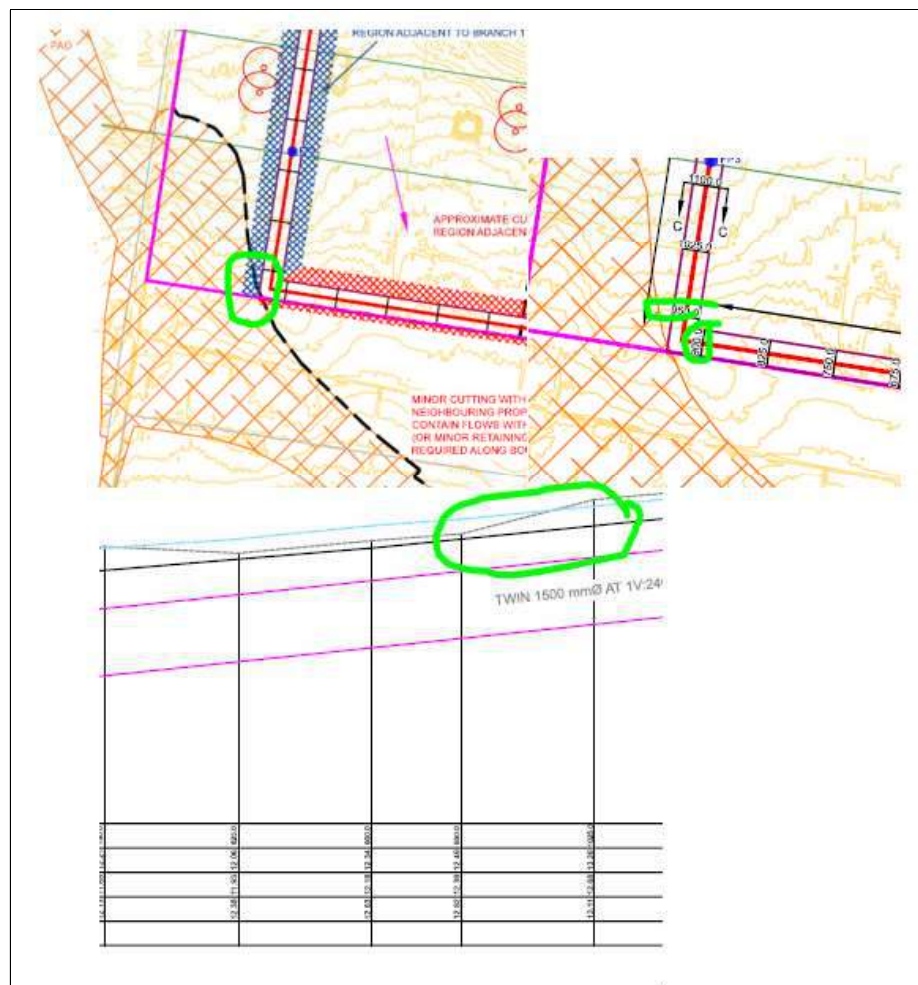
There is disagreement between the two consultants (Context and John Patrick) on whether Tree 3 is deserving of inclusion in the heritage protection.

The proposed Incorporated plan “Windarra’, 40 Greenhills Road Pakenham, Incorporated Plan – Permit Exemptions, September 2020” provides a permit exemption for all trees located that part of the proposed road reserve to which HO16 is proposed to apply, leaving no item of heritage significance located in that part of the proposed curtilage.

Accordingly, it is recommended that the proposed curtilage be reduced to exclude that part of the land to be used for the widening of Greenhills Road.

Functional Design of Drainage Assets and Concept Design of Overland Flow Paths (Stormy Water Solutions 26 May 2020)

The drainage design shows a small section of cut and fill batters in the PAO for the Koo Wee Rup Bypass. Although it is a minor intrusion, a permit application and referral to DoT will be required under the PAO clause. Council/VPA should note the possibility that DoT may object, and it may be prudent to limit any earthworks to outside the PAO.



Proposed Provisions

Schedule to Clause 66.04 Referral of Permit Applications Under Local Provisions

The Amendment proposes to apply the Urban Growth Zone and Schedule 6 to Clause 37.07 Urban Growth Zone to the subject land.

Under Clause 37.07-13 an application under any provision in the scheme that is generally in accordance with the precinct structure plan applying to the land is exempt from the notice requirements of section 52(1)(a), (b) and (d) and the decision requirements of section 64(1), 2(2) and (3).

This provision has the potential to exclude the Department from participating in decision-making and reviews of decisions relating to:

- The development of Greenhills Road;
- The subdivision of land adjacent to Greenhills Road; and
- The creation or alteration of access to Greenhills Road.
- The putting up for display an Electronic or animated sign within 60m of Greenhills Road

Although Greenhills Road is proposed to be zoned “RDZ1” as part of this amendment, it will not be declared an arterial road under the Road Management Act 2004 for many years. Accordingly, the Head, Transport for Victoria would not be a Referral Authority for permit applications under cl 52.5-3 or cl 52.29-2 and the Department’s views would not be required to be sought in relation to permit applications under cl36.04-2.

Accordingly, it is recommended that the Head, Transport for Victoria be identified as a Recommending Referral Authority for these matters at Clause 66.06.