

Submission to

# Officer South Employment PSP & Amendment C274card

345 Officer South Road, Officer

Client

Abiwood OSR Pty Ltd

Issued

24 October 2023





Introduction

Beveridge Williams makes this submission to the Officer South Employment Precinct Structure Plan (OSEPSP) and associated Amendment C274card on behalf of Abiwood OSR Pty Ltd ('the developer') who will be developing the land at 345 Officer South Road, Officer South ('the subject land/site') on behalf of the landowner. The 84-hectare site is centrally located within the PSP, with frontage to Officer South Road along the western boundary and the high-voltage transmission line easement partially adjoining the southern boundary of the site.

The proposed planning scheme amendment C274card principally seeks to implement the draft PSP and Officer South Infrastructure Contributions Plan (ICP).

Property Details	
Address	345 Officer South Road, Officer South
Formal Description	<div><div>•</div>Lot 1 TP128503</div> <div><div>•</div>Lot 1 TP411329</div>
PSP Property Id. #	<div><div>•</div>OS-36</div> <div><div>•</div>OS-40</div>
Municipality	Cardinia
Site Area	83.52 ha (approx.)
Existing zoning	<div><div>•</div>Urban Growth Zone (UGZ)</div>
Existing overlays	<div><div>•</div>Land Subject to Inundation Overlay (LSIO)</div>
Contact	<div>Fiona Wiffrie</div> <div>Principal Town Planner</div> <div>Beveridge Williams</div> <div></div> <div></div>



Figure 1: Site Context - 345 Offocer South Road, Officer South Source: NearMap

Proposed Planning Controls

Amendment C274card, seeks to apply a number of planning controls to the site at 345 Officer South Road to facilitate the future use and development in accordance with the PSP Plan 3: Place Based Plan (Figure 7). The proposed controls include applying the:

- Urban Growth Zone - Schedule 7 (UGZ-7) which refers to the Officer Precinct Structure Plan (Figure 2);
- Special Controls Overlay –Schedule 14 (SCO-14) to the whole site (Figure 3);
- Public Acquisition Overlay – Schedule 8 (PAO-8) to the north of the proposed 41m Thompsons Road alignment (Figure 5); and
- Infrastructure Contributions Plan Overlay – Schedule 3 (ICO-3) to the whole site (Figure 4).

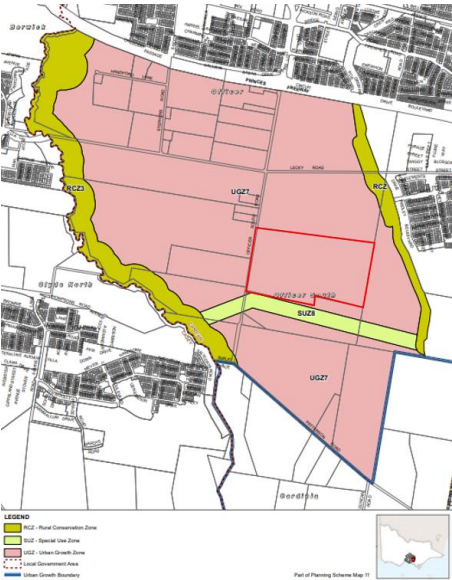


Figure 2: Proposed UGZ-7 Source: VPA

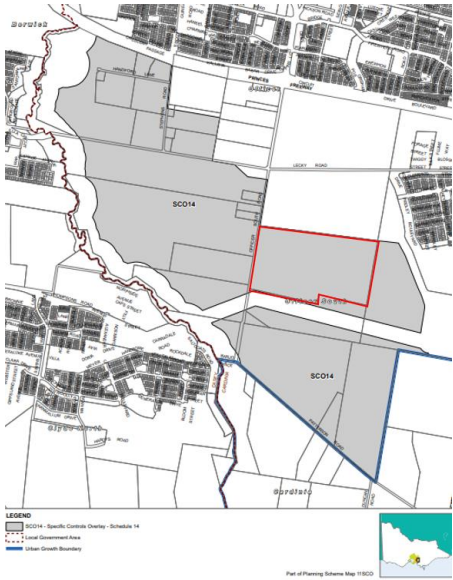


Figure 3: Proposed SCO-14 Source: VPA

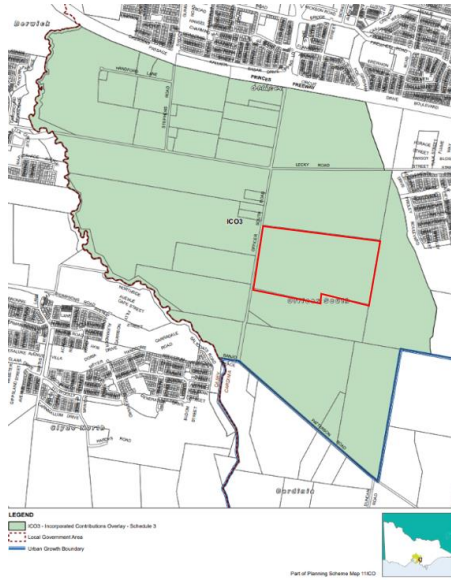


Figure 4: Proposed ICO-3 Source: VPA



Figure 5: Proposed PAO-8 Source: VPA



### Submission Summary

It is the developer's vision to maximise to its full extent, the development potential of 345 Officer South Road for Industrial and employment uses as intended under the State Significant Industrial Precinct (SSIP). This submission advocates for a flexible land use designation of industry across land within the Officer South Employment PSP, with provisions for suitable supporting business/commercial uses.

The PSP objectives clearly promote industrial and employment land as the priority for this precinct, as does the PSP Vision which notes that 'Officer South Employment will become an innovative and sustainable employment precinct that will deliver a high amenity regionally-significant commercial area and state-significant industrial precinct, combined with a modern and diverse urban living hub to form a unique working and living environment'.

The submissions made within this document seek to ensure that:

- any staging and planning controls are provided to assist with the timely delivery of the PSP, most importantly to allow the provision of industrial land in this SSIP to be provided in the shorter term.
- the outcome of the SSIP is not compromised by unresolved and/or unfounded requirements.
- the alignment of what will be State significant arterial road infrastructure through the subject site and precinct is designed to:
  - have an alignment that is not dictated by intangible high-level reviews of sites, which has negative flow-on effects for the development of the SSIP;
  - maximise the use of existing infrastructure (i.e. along Officer South Road);
  - minimise land-take for infrastructure that could otherwise be developed for industrial purposes;
  - circumvent the creation of land-locked allotments through the realignment of Officer South Road; and,
  - not create irregularly dimensioned land parcels which subsequently reduces development efficiency and 'developable' land.
- the land designated as SSIP land is not compromised through the retention of trees that are not of a very-high significance value.
- the use of existing constrained land such as the easements, is maximised to limit the land take of otherwise developable land, and where easements cannot be used, they are rezoned.
- GAIC Works in Kind is considered due to the significant amount of State Infrastructure within the OSEPS.

The submissions outlined in this document support development of the site, consistent with the intent of the Melbourne Industrial and Commercial Land Use Plan (MICLUP) and responsive to the South-East Economic Corridor Strategic Context Report (SEEC).

This submission identifies challenges presented under Amendment C274card in the delivery of an efficient, timely and financially viable employment and industrial precinct. Accordingly, key issues raised in this submission primarily focus on the following areas:

- Infrastructure Service and Delivery
- Alignment of Thompsons Road
- Alignment of Officer South Road
- Public Acquisition Overlay Schedule 8
- Efficient use of easements and public open space
- Rezoning of the gas easement
- Other considerations

Our requested amendments to the Place based Plan to address the concerns and ensure a minimally compromised SSIP can be developed can be found at Figure 8.

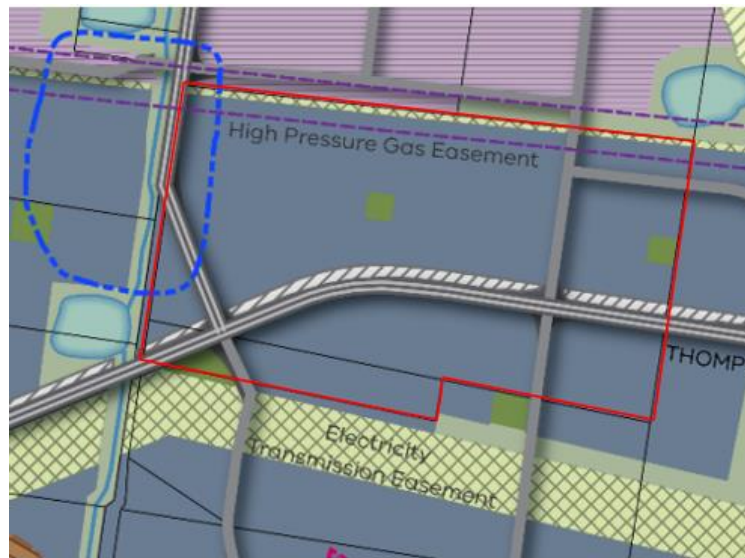


Figure 6: Extract from PSP Plan 3 – Place based Plan  
Source: OSEPS

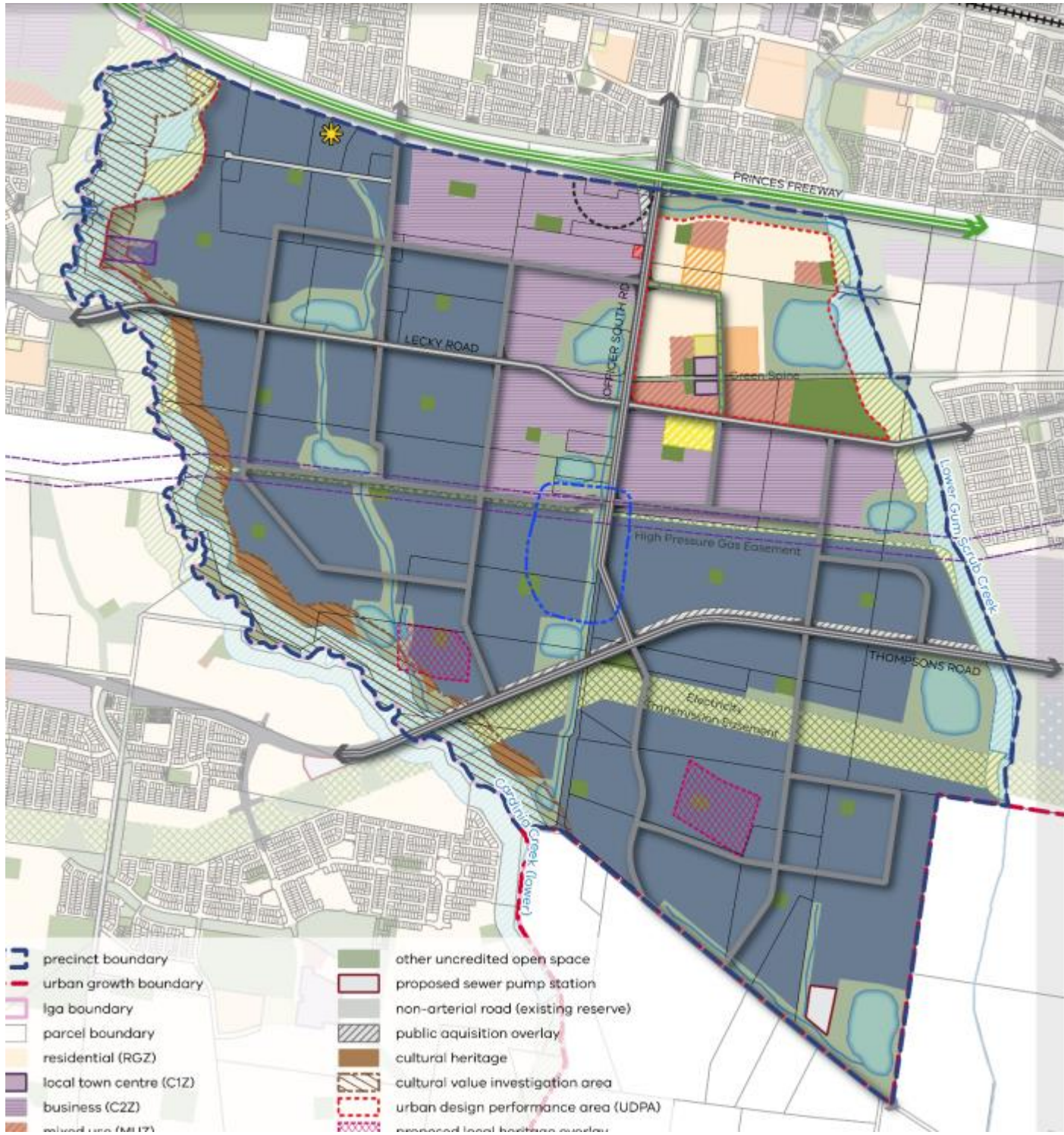
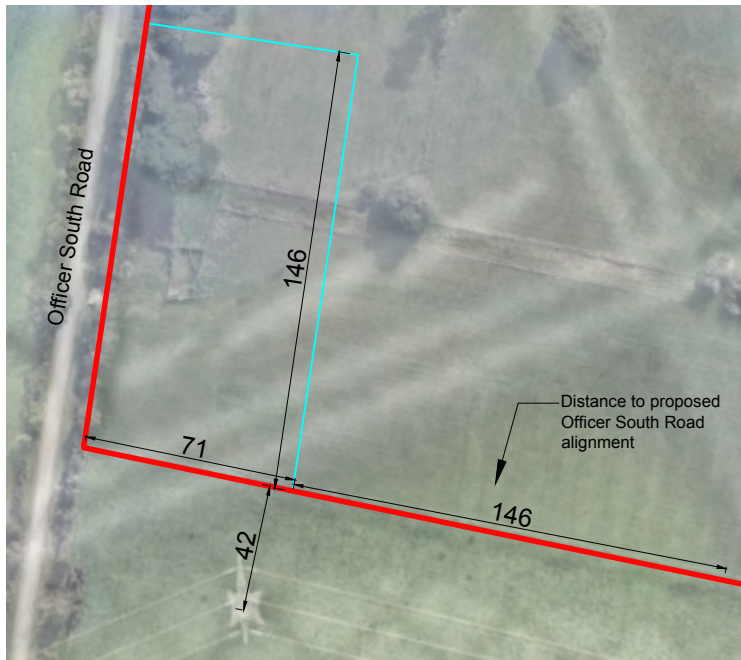
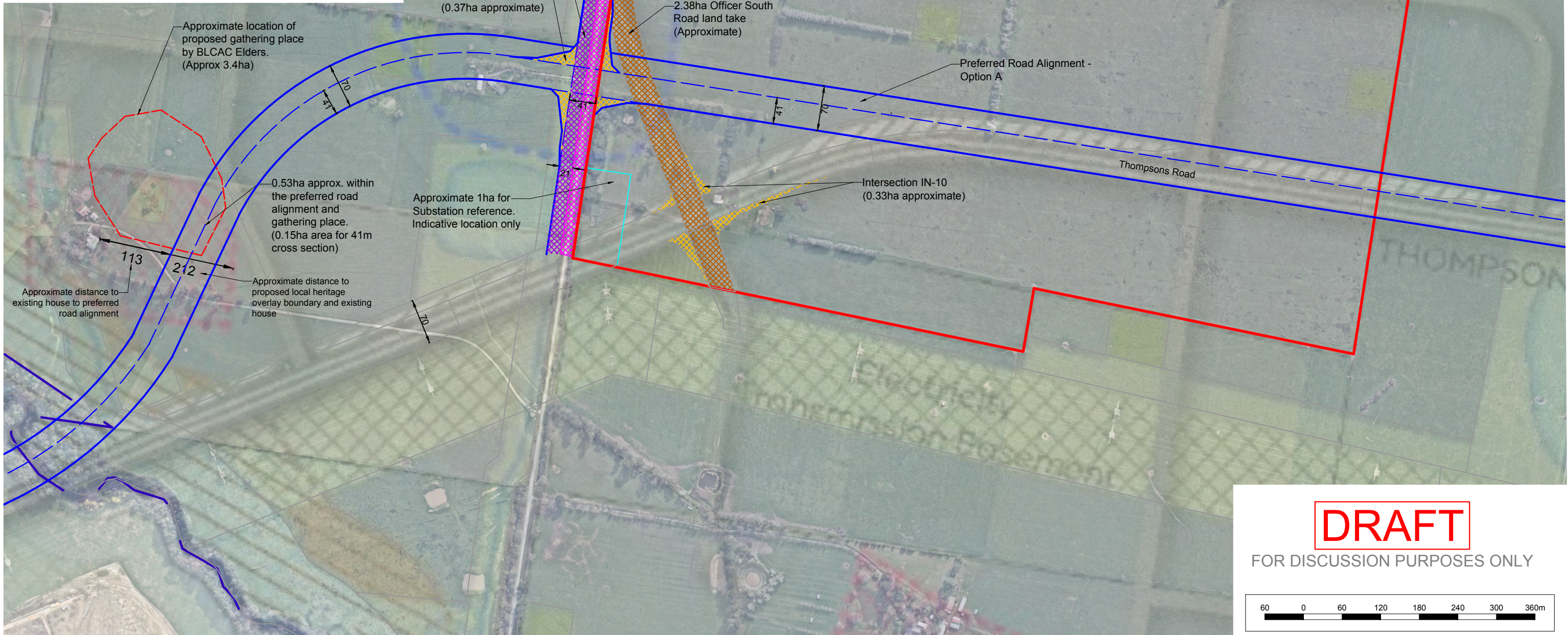


Figure 7: Plan 3 – Place based Plan Source: OSEPS



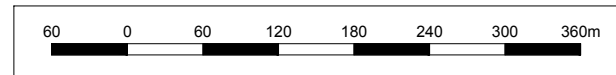


PAO9 - 1ha AusNet substation - 1:2500



**DRAFT**

FOR DISCUSSION PURPOSES ONLY





Infrastructure Service and Delivery

The State government's *Melbourne Industrial and Commercial Land Use Plan* (MICLUP) has identified the OSEP as a State Significant Industrial Precinct (SSIP) and a Regionally Significant Commercial Area (RSCA).

Staging of the precinct as currently proposed prioritises the delivery of residential land over the delivery of regionally significant commercial and state significant industry, when there is an under-supply of industrial land in the south-east. The staging as currently proposed will not deliver the priority employment precinct in the near future due to stages being linked to key infrastructure that cannot be delivered, or is not currently funded, programmed or necessary.

A range of servicing infrastructure is required to facilitate the development of the precinct. Early upgrades to infrastructure services are required to support development of the precinct regardless of use (industry or housing).

In particular AusNet Services advise that the 'electricity network in the area is almost at capacity' and it has identified the need for a new 1ha Zone Substation. AusNet's preferred location for a new Zone Substation 'is on Officer South Road, north of the transmission easement. The closer to the transmission easement, the better'. This makes 345 Officer South Road the priority site for the future Zone Substation. This land is currently shown in Stage 2 and no mechanism for Ausnet to acquire that land has been proposed. The ideal location for the Zone Substation can be seen on Figure 8.

Two key arterial roads intersect at the subject land. The GHD traffic modelling report notes that – *Thompsons Road is forecast to carry significant amount of traffic (75,000 vpd east of Berwick Cranbourne Road) due to its extension and widening. In addition to Thompsons Road, Grices Road (13,000 vpd east of Officer South Road) and Officer South Road (39,000 vpd north of Grices Road) would carry most of the traffic through the area.* The intersection of these two roads occurs at the subject site. It is critical that this infrastructure is delivered in the shorter term to open up the precinct.

It is submitted that a greater commitment needs to be made with the State Government to ensure that the completion of the diamond interchange IN-13 is delivered in a timely manner.

Thompsons Road is an identified state level arterial road to facilitate freight movement. There are no mechanisms in place for the precinct to be connected to the west to enable key infrastructure to be delivered.

Further, as the key arterial road to facilitate employment uses within OSEP, it is necessary that the bridge crossing BR-04 which connects Thompsons Road to the Clyde North PSP and the Thompsons Rd PSP to the west be identified as a priority crossing, noting that development of Thompsons road, west of Cardinia Creek is currently under construction, thus allowing an appropriate connection. It is noted that the PSP does not include a timeline or pathway for the bridge delivery. Therefore, there is no clear pathway for the PSP to be delivered. As it stands, it may never be delivered.

Proposed SCO-14 requires ICP project BR-01, which is proposed to connect the residential precinct in the Cardinia Road Employment PSP to the residential precinct proposed in the Officer South Employment PSP, to be constructed prior to the issue of a planning permit for any development in Stage 2. It is submitted that BR-01 should be linked to further developing the residential land in that area as that bridge will provide a key connection between the existing residential area in the Cardinia Road Employment PSP to the community infrastructure being provided to improve their lifestyle within the OSESP.

Whilst it is submitted that the OSEP should not be subject to restrictive staging, if staging is proposed then Incorporation of the subject site and other crucial land holdings into Stage 1 will facilitate the delivery of critical infrastructure required for the entire precinct in a timely manner. It will also facilitate the development of land for industry and employment in the early stages of the PSP development, aligning with the PSP objectives. Figure 9 identifies those sites and the concerns with the current proposed staging.

Requested Changes

- **Restrictive staging of the precinct should not be applied, enabling the bringing forward of key infrastructure in strategic locations for the benefit of the wider precinct, and enabling larger landholdings with the capacity to undertake works in kind to proceed early in the development of the precinct.**
- **If restrictive staging is pursued, 345 Officer South Road should be included within Stage 1 of the PSP Plan 12 and removed from the SCO to ensure efficient and timely development of the precinct, as should any land to the west required for the Thompsons Road and Officer South Road intersection delivery and between that intersection and BR-04 (see Annexure A and Figure 9).**
- **Remove BR-01 from any requirements prior to the development of industrial land in the SCO (see Annexure A and Figure 9).**
- **Include the land with an applied Residential Growth Zone under UGZ7 to the SCO-14.**
- **Require the construction of BR-01 prior to the issue of any permit associated with land with an applied Residential Growth Zone under proposed UGZ7 (see Annexure A).**
- **Apply the PAO to the land required to facilitate the Zone Substation. The PAO is the most appropriate planning control to apply to land to facilitate critical infrastructure.**
- **Apply the PAO to BR-04 to ensure the acquisition and construction of the bridge crossing can occur at the earliest possible time if the land within which it is located is not being developed.**
- **Apply the PAO for the Thompsons Road reservation from at least BR-04 to the Officer South Road alignment to enable an alternate shorter term access solution to the SSIP if IN-13 is unreasonably delayed.**

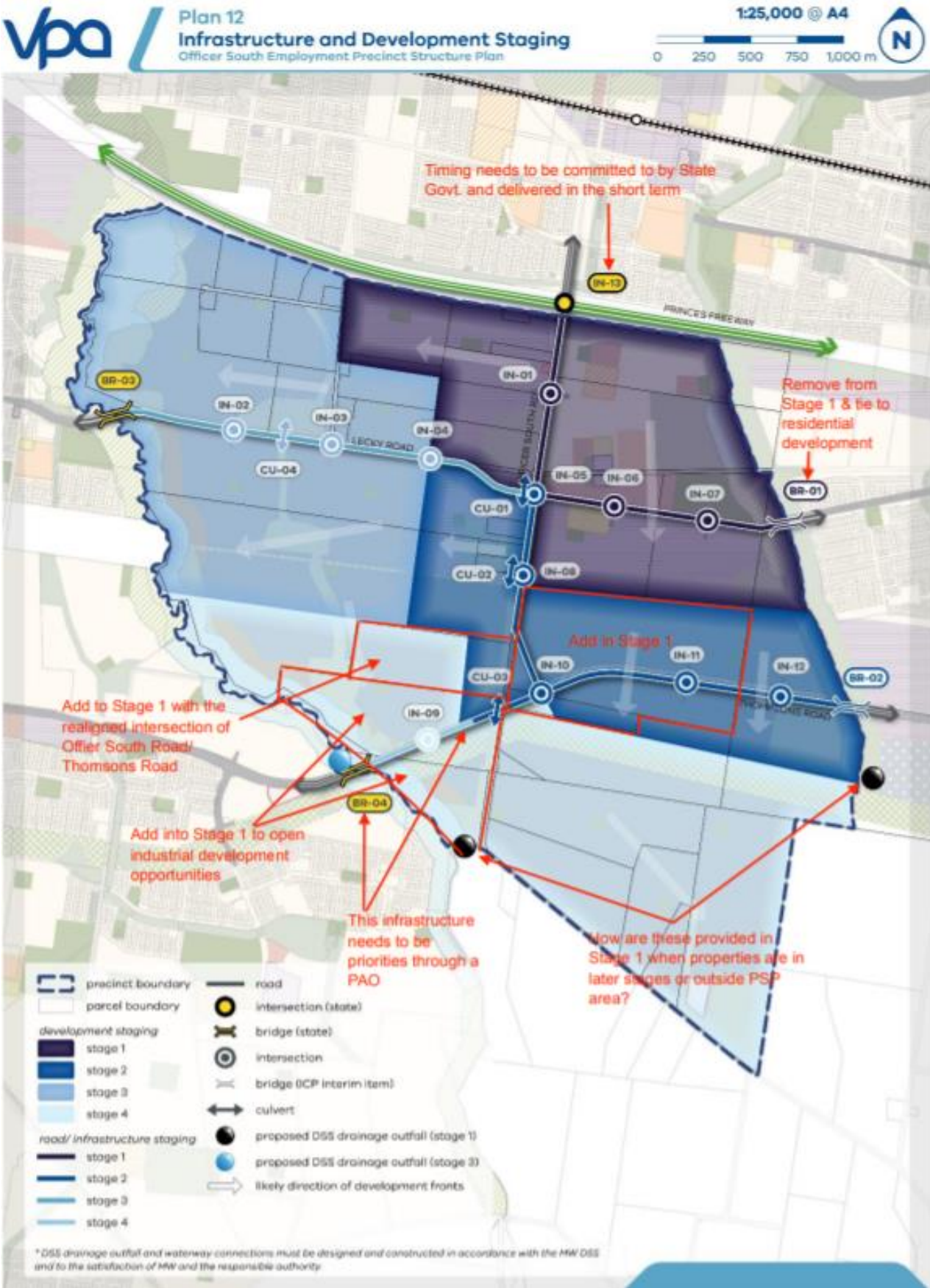


Figure 9: Minimal amendments required to Plan 12 Infrastructure and Development Staging of the OSESP.



Alignment of Thompsons Road

The future alignment of Thompsons Road is proposed to traverse through the subject site. This is supported as it provides a logical and orderly movement network to facilitate industrial and commercial development and to continue that road connection between the western and eastern road alignments outside the OSEPSP. The proposed alignment however, which flows onto the alignment of Officer South Road is not supported.

Reviewing the Alignment Options Assessment matrix from the *Officer South Employment PSP Background Report, September 2023*, there is little difference between Options A and B once an analysis of external variables have been applied. Moreso, the outcomes that have influenced the alignment of Thompsons Road resultant of the post contact heritage assessment, arboriculture assessment and Aboriginal cultural values assessments are questioned.

Options Assessment Outcome for Alignment of Thompsons Road (Extract from VPA Background Report, Table 4)

	Meets Fixed Reqs.	Enviro/ Heritage Risk	Curve Related Safety Risk	Capital Cost	Residual Land Risk	Council Delivery Risk	Land- owner Risk
Option 0	Yes	Low	Medium	Medium	High	Low	High
Option A	Yes	Medium	Medium	Medium	Low	Low	Medium
Option B	Yes	Low	Low	Low	Low	Medium	Medium
Option C	Yes*	Low	High	Medium	Medium	Low	Low

\*with further modification

(Further information on the alignment options assessment has been requested from *Major Road Projects Victoria* (MRPV) via the VPA however no information has been forthcoming. We have been limited to the information provided in the VPA Background Report when considering this matter.)

Analysis of the MRPV Option Assessment Matrix

Curve Related Safety Risk

Concerns regarding *curve related safety risk* are relative, assuming that all options analysed were prepared to the required Australian design and safety standards. It is submitted that according to those Standards, the alignment of Thompsons Road in Option A will provide for the safe and efficient movement of industrial traffic, with any curve in the road also aiding in reducing traffic speeds. Such curvatures within the arterial road network are not uncommon and that alone should not be a reason to discount the alignment.

Capital Cost

As illustrated in Figure 8, the Option A alignment of Thompsons Road, inclusive of the 29m wide PAO, measured from Cardinia Creek to where Options A & B meet on the subject land is 11.37ha, whilst Option B equates to a slightly reduced land-take of 9.99ha. Additional cost implications, when comparing Options A and B equate to an additional 1.38ha of land, but only when considering land-take and construction of Thompsons Road. The matrix does not account for the residual costs associated with the proposed alignment, and specifically the loss of net developable area for SSIP land. This is a result of the subsequent realignment of Officer South Road (see further information within this submission and the provision of sub-standard industrial land as a consequence of irregular and ill-dimensioned allotments being generated by the road alignment.

As a SSIP, the PSP encourages *'large and intensive industrial land uses within the core of the precinct'*. Consideration of subdivision design to maximise land to facilitate these uses should be given significant weight in the design and location of arterial roads that will support the functioning of these uses.

Thompsons Road and intersecting arterials should be re-aligned to ensure that both sides of the road can maximise the development potential of the SSIP.

The impact of the chosen alignment of Thompsons Road on capital costs must therefore not be considered in isolation.

Enviro/Heritage Risk

The consideration of potential environmental and heritage risks has been identified in the MRPV Option Assessment Matrix. Following a review of the PSP background studies, it appears that there are potentially three key factors that have informed the proposed alignment of Thompsons Road:

- Preliminary Tree Assessment
- Aboriginal Cultural Heritage
- Post Contact Cultural Heritage

1. Preliminary Tree Assessment

Homewood Consulting undertook a *Preliminary Tree Assessment* (24 Sept. 2020) to inform the PSP. The consultant confirmed that access to the site at 410 Officer South Road was not available. The trees located on this site have therefore not been assessed, and yet they are identified as *'potential high retention trees'*, where the closest tree, we note is located approximately 421m from Officer South Road. As illustrated in Figure 8, Proposed Option A alignment would impact on these trees which has likely impacted on the MRPV Options rating, without proper consideration or verification. Unless the trees can be verified as having a high retention value, the proposed Option A alignment should be considered to further the SSIP. It is strongly submitted that a desktop assessment should not dictate a state significant road alignment.

2. Aboriginal Cultural Heritage Assessment

The Tardis December 2022 *Aboriginal Cultural Heritage Values Assessment* investigates Aboriginal Cultural Values (ACV) to *add meaning to various aspects of the cultural landscape for both Bunurong people and the broader Australian community*. The assessment report notes that *'ACVs can be used as contemporary tools to assist in understanding how intangible Aboriginal heritage is defined'*. In determining ACV within the Officer South Precinct, the Bunurong Land Council Aboriginal Corporation (BLCAC) was consulted and determined that the Officer South activity area was located within an area of cultural importance to the Bunurong. More specifically, the BLCAC identified the highpoint located in proximity to the HO-91 dwelling as a place of importance that should be recognized in the PSP.

In determining the location of state important infrastructure, a thorough analysis of potential sites of significance should have been undertaken. It is understood that access to the culturally significant site was not available, yet the recommendation is to preserve 3.4ha of land that would otherwise be used for employment and industry, as a significant aboriginal place for gatherings and ceremonies and determined solely by contours of the land. i.e. the AVC has not assisted in understanding the intangible heritage, nor does it justify the outcome of land reservation.

Whilst acknowledging the significance of the entire precinct for aboriginal cultural values, it is submitted that the Aboriginal heritage values alone should not rule out the Option A road alignment, and certainly not without a comprehensive site assessment to confirm values.

If utilising Option A, the loss to the identified significant high-point would be 0.15ha (based on the 41m cross section), and applicable to land on the eastern-most edge of the aboriginal place boundary. The encroaching land is located furthest from Cardinia Creek which is noted as a highly significant area to the BLCAC and the area to which the subject high-point would overlook..

3. Post Contact Heritage Assessment

The proposed Thompsons Road alignment also appears to be informed by Heritage Overlay HO-91 which relates to *Cardinia Park, Former Gin Gin Bean Pre-emptive Right Site*. Whilst Amendment C274card seeks to reduce the extent of the heritage overlay as it currently applies to the subject land, it is submitted that the proposed Heritage Overlay extends beyond the citation and should be further refined.

The heritage citation prepared by Graham Butler & Associates, 1996 notes that the heritage values are limited to the house and the outbuilding only. The citation also states *'There is no indication of mature trees which might have lined the long driveway into the house'*. It is submitted that the trees located along the driveway should therefore be removed from the proposed HO-19. The HO should also not be seen as giving any value to those trees when considered by Homewood Consulting (discussed above).

As Benchmark Heritage Management (BHM) have fully relied upon the former Graham Butler heritage citation to inform their argument, it is submitted that modifications to HO-91 should be contained to the elements supported by the citation. This outcome would therefore not discount Option A as a potential alignment and still provide a sufficient buffer and retain the garden around the existing homestead.

The Heritage citation is contained as **Annexure B** to this submission.

Requested Changes

- **Re-locate Thompsons Road to the Option A alignment.**
- **Reduce proposed HO-91 so as its eastern boundary is approximately 100-120m from the existing homestead on the land.**



Alignment of Officer South Road

It is submitted that the realignment of Officer South Road as proposed will increase payments under the Infrastructure Contributions Plan (ICP) for no added benefit to the design or efficiency of the OSEPSP. Specifically, in addition to the construction of an arterial road, the ICP includes the additional land that is required to support this infrastructure.

Importantly, we note that:

- The re-alignment of Officer South Road has not been rationalised and is deemed an expensive and unnecessary outcome to the efficient delivery of movement and infrastructure services required within the PSP, particularly when having regard to the unfounded influences that have seemed to dictate the alignment of Thompsons Road.
- The realignment of Officer South Road as proposed under the OSEPSP sees a land-take of 2.71ha from our client's land, where a widening of the existing alignment to the west (to retain the existing overhead powerlines as required by AusNet) would only require 1.74ha of land. This would provide an additional 1.03ha of SSIP developable land as well as facilitate a more conventional subdivision layout and lot access to facilitate large-scale industry.
- The proposed realignment extends south and continues to reduce land that would be suitable for industrial development.
- It is submitted that a reduction in land uses that encroach into the NDA is responsive to the Vision for the OSEPSP and the affordability of development within this precinct.
- Shifting the road off the existing alignment also has the potential to land-lock and stifle development to the west of the proposed alignment.
- The DSS and arboricultural reports used to inform the PSP do not require the realignment of Officer South Road to facilitate drainage or the retention of trees.
- The PSP Place Based Plan does not identify any encumbrances on the site to justify the need to re-locate the road as proposed. The trees proposed to be retained onsite have been reassessed by Ecolink to determine their ecological merit and confirm that the trees lining Officer South Road to be of little value (see below).
- AusNet require the new zone substation to be located within the south-western corner of 345 Officer South Road. For that asset to be in place in the shorter term, it will need to have an abuttal to an existing road reserve (as shown in Figure 10). It is impracticable for a large substation to sit in the middle of what would potentially have to continue to be a working farm if the staging as currently proposed under the OSEPSP was implemented.
- Current services are located within the exiting Officer South Road reserve.
- Proposed services as informed by the service authorities will continue to utilise the existing Officer South Road alignment in the future. Removing its reservation status, if possible due to the location of services, would result in additional costs and of little benefit, likely also resulting in further wasted and/or under-utilised land.
- The realignment of Officer South Road will create impediments to the NDA on the subject land by necessitating the need for unconventional lot dimensions and sizes to support large scale employment and industry uses as sought by the MICLUP and the OSEPSP. The outcome is one of un-useable wasted SSIP land.
- The unconventional lots located between two key arterial roads will create challenges with access. Figure 10 shows that any access would need to sit within 160m of the intersection and that access would also be constrained, reducing development opportunities for SSIP land and challenges surrounding safe access/egress.
- The creation of an inaccessible local park as a consequence of the arterial road network is a financial burden within the ICP that does not benefit the PSP in any way.

Requested Changes

- **Relocate Officer South Road to its current alignment and widen as required in both the OSEPSP and ICP to enable the 41m ultimate road reservation.**

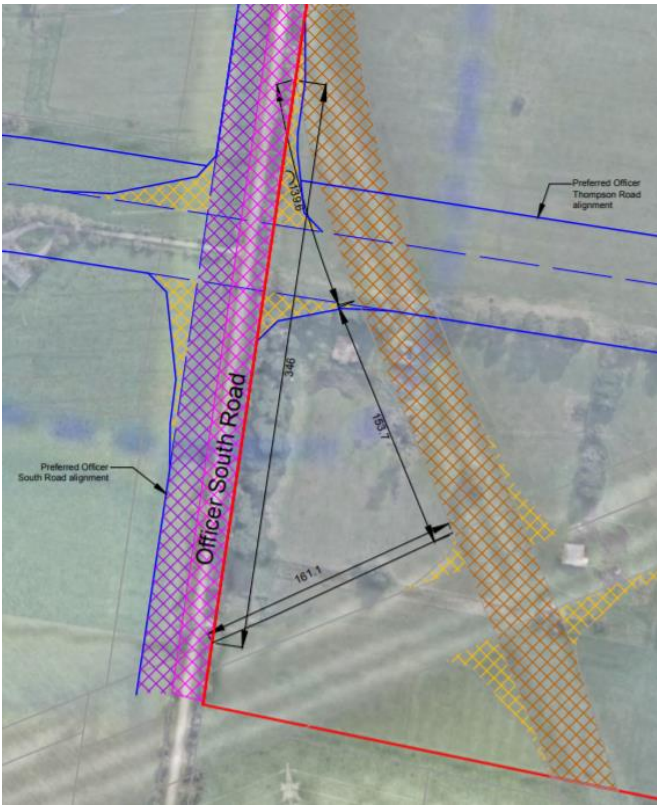


Figure 10: Proposed and Preferred Alignments of Officer South Road Source: Beveridge Williams

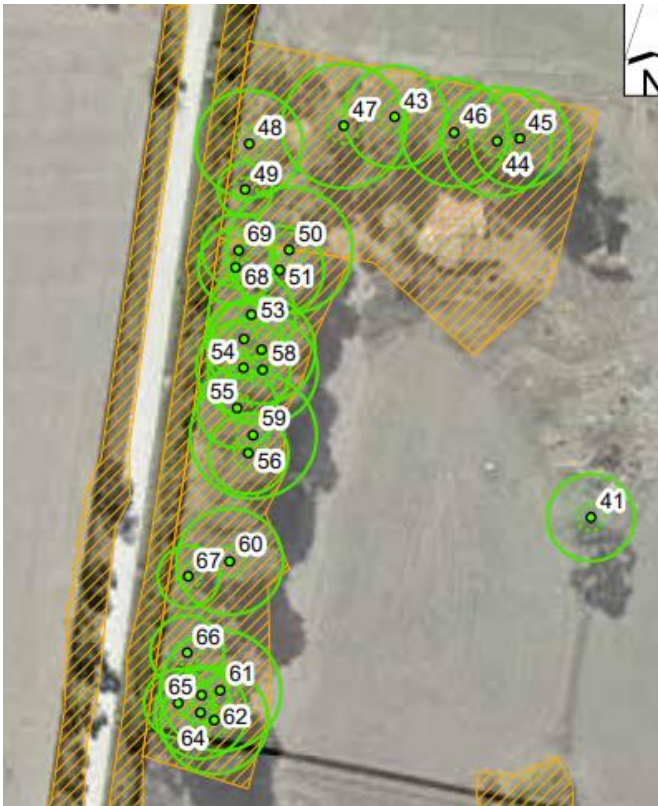


Figure 11: Trees along Officer South Road frontage Source: Homewood Consulting Group

Tree Retention

Ecolink Consulting has undertaken an assessment of the ecological merit associated with the trees nominated for retention along Officer South Road on behalf of our client. The trees assessed included Tree ID #48-69 as identified in the Homewood Consulting Preliminary Tree Assessment and identified in Figure 11. A copy of the Ecolink Assessment is contained as an **Annexure C** to this report. The Ecolink assessment concluded the following:

*'The current assessment has assessed the ecological merit of the trees, not just the integrity and amenity of the trees. It is our determination that the trees are of low ecological merit on the basis that:*

- *The vegetation within the study area is highly modified from its pre-European state, due to historic and ongoing land uses;*
- *The trees within the study area not indigenous to the study area;*
- *The trees within the study area have been planted for amenity purposes;*
- *They provide habitats to locally common fauna species, but are unlikely to provide habitats for threatened flora species, and are unlikely to provide important habitats for threatened fauna species;*
- *They do not constitute a patch of native vegetation, and are not classified as scattered trees under the Guidelines for the Removal Destruction or Lopping of Native Vegetation;*
- *As planted non-indigenous vegetation, they do not currently require a permit for their removal; and*
- *The trees are currently relatively isolated within the landscape and do not provide a habitat corridor or bioink. They will be further isolated post development.*

*To mitigate the minor ecological impacts of the tree removal from the study area, fauna should be salvaged from the trees, consistent with the Wildlife Act 1977 (Vic), and amenity trees could be planted in accordance with the Cardinia Shire Council's Developer landscape guidelines – January 2017. It is concluded that the trees are therefore not worthy of retention from an ecological perspective'.*

Noting that the OSEPSP is designated as a SSIP it is expected that the road infrastructure will be significant and thus costly. It is therefore considered that the diversion of the current Officer South Road alignment to preserve trees of limited significance is inefficient and will only create functional problems with a future subdivision and layout on the subject land as has previously been discussed.

Requested Changes

- **All trees in this location to be removed.**



Public Acquisition Overlay – Schedule 8

The Public Acquisition Overlay – Schedule 8 (PAO8) is proposed to be applied to part of the subject land to facilitate an additional 29m land take for Thompsons Road (Figure 12). It is understood that it is intended that the PAO8 safeguard the need to accommodate potential flood mitigation measures associated with Thompsons Road.

There is no justification within the documents provided for this additional land-take. Applying the PAO on a ‘just-in-case’ basis has the potential to jeopardise the development of the area. It is submitted that a flood study or an engineering assessment must support the land take proposed under the PAO.

If land located within the PAO is not required and this outcome is not known until after development of the site has commenced, the land located between Thompsons Road and the industrial lots will become surplus and almost certainly undevelopable, given access arrangements and the development of lots existing along the road frontage. This outcome results in a reduction of what would otherwise be developable industrial land, as a consequence of insufficient detail in infrastructure planning and design.

It is submitted that the PAO land should be included within the ICP if it is required to facilitate the future Thompsons Road. Critical land must be covered by the ICP so it is provided upfront to ensure that service infrastructure and the road is constructed in the ultimate location in the first instance – reducing the need for future redo works at a great expense.

In addition to the above, it is noted that the 29m PAO is identified to the north of the Thompsons Road alignment. The cross-sections for that 70m road in the OSEPSP shown in Figure 13 below however show that the batters for that road are to both sides of the 41m arterial road reserve. Accordingly, if the PAO is required, it should be located to either side of the road as per the cross-section to avoid the road being built too far south in the first instance.

Requested Changes

- **Determine if the land is definitely required and if not, delete the PAO, prior to the finalisation of Amendment C274card.**
- **If determined a 70m reservation is required, include the ultimate 70m land reservation for Thompsons Road within the ICP.**
- **If the PAO is required and only applied to the 29m, apply 14.5m either side of the 41m Thompsons Road alignment or revise the 70m cross-section accordingly for Primary Arterial 6 Lane – Thompsons Road.**

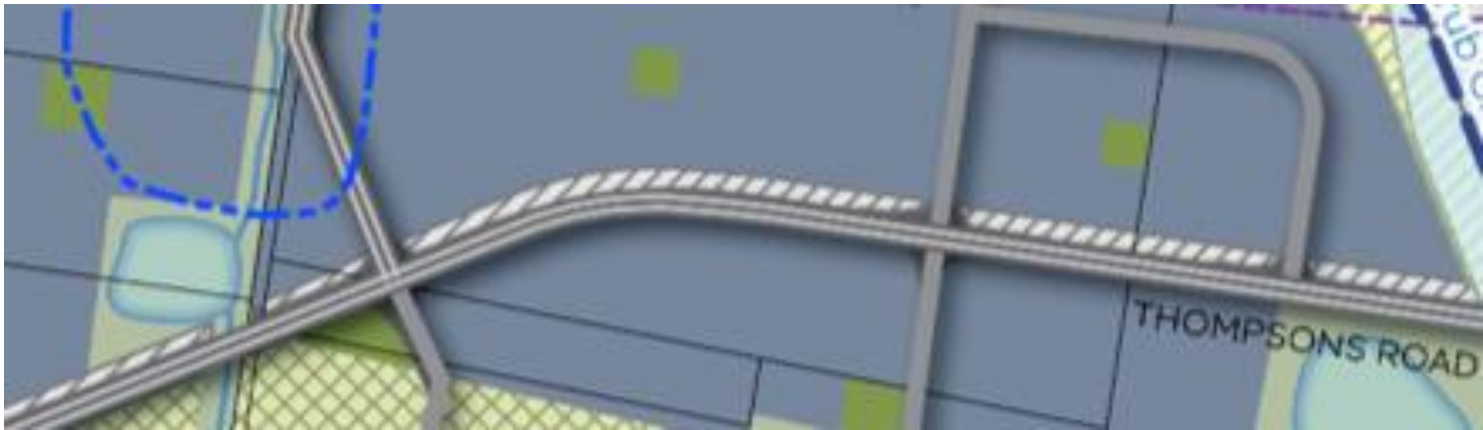


Figure 12a: Additional 29m of land along the northern side of Thompsons Road Source: VPA



Figure 12b: Proposed PAO8 along the northern side of Thompsons Road Source: VPA

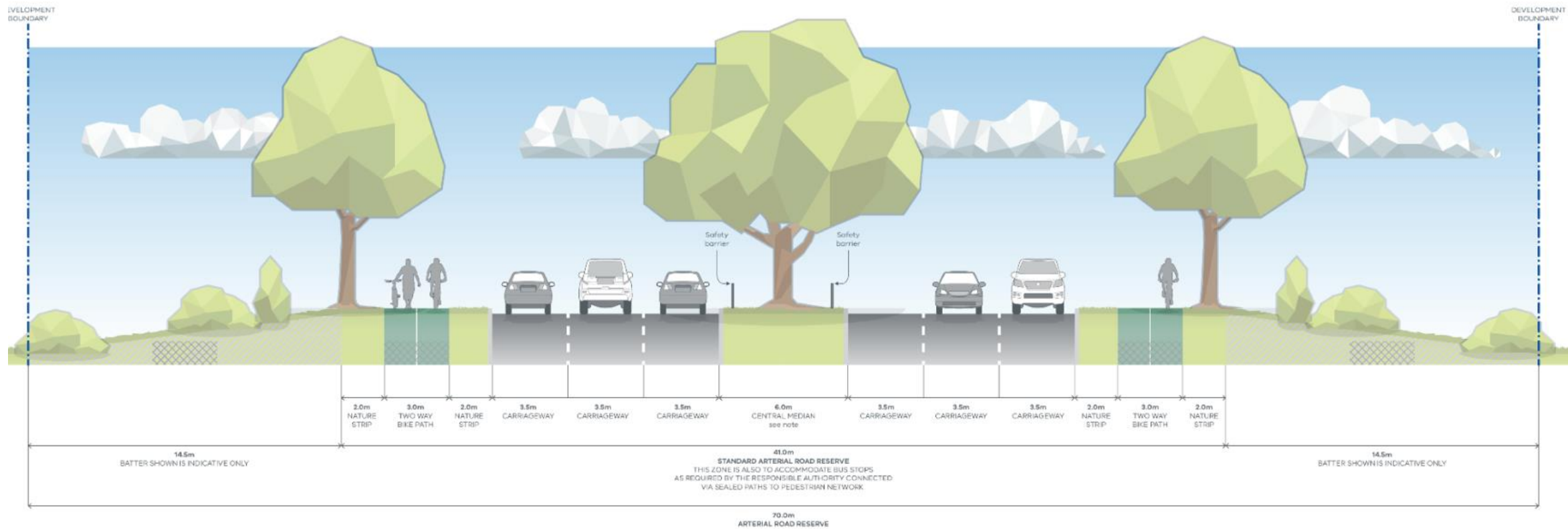


Figure 13: Proposed Primary Arterial 6 Lane - Thompsons Road 70m Cross-Section Source: VPA



## Efficient Use of Easements and Public Open Space

The purpose of public open space (POS) serves in an employment precinct is one that supports mental health breaks and lunchtime activity rather than organised recreation that would typically require a well-proportioned open space reserve, as required in a residential area.

It is submitted that the use of encumbered land should be considered for POS purposes for the SSIP as it is capable of facilitating infrastructure that supports walking, running, cycling and siting. Land use and cost efficiencies could be found by redistributing proposed POS reserves throughout the designated employment precinct into the linear easements that traverse the precinct or alongside/combined with areas where significant vegetation must be retained.

Specific to 345 Officer South Road, it is submitted that Local Parks LP-18 and LP-19 could be relocated to enhance the existing 20.1m wide gas easement, or LP-18 located to accommodate the single tree identified as being retained on Plan 7- Native Vegetation Retention & Removal within the OSEPSP.

Similarly, the transmission line easement can facilitate POS in place of LP-20 which, as currently proposed is unlikely to be accessed due to its location between a significant intersection. That transmission line easement can also facilitate land required for drainage purposes/wetlands to free up more land availability for the SSIP.

The existing easements provide an extended linear corridor that is conducive to the type of recreation that normally occurs within an employment node. i.e. walking and 'brain breaks'.

Consistent with the GHD Utility Servicing Report, APA Group support the use of the gas easement for recreation and open space purposes. In particular, pathways can provide passive recreational opportunities, and support visual integration with adjacent public spaces. Similar permission from AusNet can also be worked through for drainage according to that Report.

The use of the gas and electricity easements for open space purposes is not a new proposition and can help maximise the use of land for employment/ commercial uses whilst still facilitating passive recreation needs to the same demographic. Examples of informal recreation within the gas easement can be seen in the neighbouring Cardinia Road Employment PSP adjoining Propeller Circuit.

The Donnelly Recreation Reserve, Cranbourne which has been established under the high voltage powerlines illustrates how active open space can be co-located with what is otherwise unusable land, with Red Oaks Park in South Morang also utilising the transmission line easement for drainage purposes.

As a SSIP, the multi-purpose use of the gas and electricity easement can make available additional land for industry whilst still providing accessible and functional open spaces.

### Requested Changes

- **Relocate POS within the designated Industrial Zone as shown on PSP Plan 3: Place Based Plan to the gas and electricity easements.**

## Rezoning of the Gas Easement

Noting that the gas easement is unsuitable for employment and industry use and development and the OSEPSP would require an off-road shared path along its extent as per Plan 5 – Public Transport and Active Path Networks, it is submitted that the applied Industrial Use Zone as detailed under Schedule 7 to the UGZ is inappropriate to the use and development potential within the gas easement.

It is submitted that the Special Use Zone is a more suitable planning control to apply to the gas easement and would allow for tailored provisions to manage the primary function of the easement, being the delivery of gas as well as open space and landscaping purposes, similar to the application being proposed for the transmission easement.

Consistent with *Planning Practice Note No. 3*, the special purpose zones, including the Special Use Zone, are used when a standard zone cannot address the individual circumstances of a site.

As the gas easement will never be used for employment or industry, it is submitted that the gas easement should be removed from the applied Industrial 1 Zone as proposed and the UGZ.

### Requested Changes

- **Rezone the gas easement to the Special Use Zone to reflect the use and development potential of land within the gas easement.**



Figure 14: Informal open space within the gas easement – Cardinia Road Employment Precinct **Source:** Near Map



Figure 15: Donnelly Recreation Reserve, Cranbourne with active open space located under the high voltage electricity easement. **Source:** Near Map



Figure 16: Red Oaks Park, South Morang **Source:** Google Earth



Other Matters for Consideration

Other issues identified within the documentation is detailed below, with the requested changes to address the issue identified in **bold**.

- Specific to the UGZ-7, if a Child Care Centre is prohibited in the C2Z, should it also not be prohibited in the IN1Z area particularly based on the uses that the precinct is trying to capture. It is suggested that a childcare centre is more appropriately located within the C2Z rather than the IN1Z where threshold distances could be applied / required.

**Amend the UGZ-7 to allow the issuing of a planning permit for a childcare centre in the C2Z and to prohibit the use of a child care centre in the IN1Z.**

- PSP Guideline 3 (G3) seeks activation of the streetscape with a maximum setback of 3m. It suggested that a 3m setback within an industrial area is not appropriate particularly in an area where large scale land parcels for heavy industrial enterprises to excel, with strong connections to the principal freight network are encouraged. Uses such as advanced manufacturing and engineering, scientific research and chemical production, aerospace and other uses that require threshold distances from sensitive uses/large parcels) will likely make this setback unachievable.

**Modify PSP Guideline G3 to: The front setback of commercial and industrial premises should be landscaped with canopy trees and vegetation where practical to promote water sensitive urban design and to help reduce the impact of the urban heat island effect.**

- PSP Requirement 14 (R14) is limiting and should be a noted as a guideline only. There are multiple examples of industrial development where car parking is located to the front of the building and good design outcomes have been achieved. This also assists in separating visitor and loading/working operations on the site (i.e. improves site safety). The need for those off-street car parking areas to connect to the primary entrances of buildings with pedestrian paths also has the ability to have entrances designed to the side of buildings so as buildings are better integrated with the street.

**Split PSP R14 into two parts, a Requirement: Commercial, industrial and retail premises loading and storage areas must be provided at either the side or rear of the building; and**

**A Guideline that states: Commercial, industrial and retail premises at-grade parking should be provided to the side of the building, with direct pedestrian paths connecting off-street car parks to the primary entrances of buildings.**

- PSP R17 is prescriptive on the timing for the preparation of a landscape plan where a landscape plan submitted as part of a permit application determine whether a permit for the proposed use and development will be issued. It is suggested that a landscape plan could be dealt with by way of permit condition, once civil drawings and detailed design are also finalised.

**Amend the preamble of PSP R17 to: Unless provided with the application, a condition of any permit issued for the subdivision of land within the PSP area must require a Landscape Plan to be submitted to the Responsible Authority for approval. The Landscape Plan must illustrate and quantify canopy tree coverage within the public realm and open space to an average of 30 per cent (excluding areas dedicated to biodiversity or native vegetation conservation).**

- PSP R18 refers to setback requirements from easements. As easements imply all those created under the subdivision to cover service, it is suggested that R18 be reworded to specifically reference the electricity transmission and high-pressure gas easements if such is required.
- Having regard to the gas easement, the PSP shows the road to the north of the high-pressure gas easement offset from the easement which seems counter intuitive. The GHD Utility Servicing Report does not note this requirement by APA and G64 only notes a required 2.1m clearance from title boundaries and a 3m clearance from buildings, which is at odds with R18.
- Further, under Plan 8 – Bushfire Hazard Areas, the easements are identified as 'low threat vegetation', likely because they are managed reserves by the easement authority. It is therefore suggested that the bushfire controls and particularly, the 19m wide perimeter road is excessive. Nominating this requirement for the easements therefore appears excessive.

**Amend the preamble of PSP R18 to: Development must provide for a minimum 19 metre perimeter road bushfire interface at the conservation area boundary, drainage reserves, constructed waterways and the southern and south-east boundary adjoining the Green Wedge...**

- PSP R24 removes the opportunity for European heritage of local significance/significance to long term land holders to be used (subject to typical naming conventions). It is suggested that this requirement be encouraged where areas of both aboriginal cultural significance and post contact heritage is identified.

**Amend R24 to: On land where cultural heritage is identified, naming associated with that heritage for streets, parks, wetlands or conservation zones, community or local town centres should be considered. For land where Aboriginal cultural heritage has been identified, this should include consultation with Traditional Owners, represented by BLCAC to inform the potential naming opportunities.**

- PSP R60 only identifies that subdivision of land within the PSP must meet the cost for all local infrastructure unless the items are covered by the ICP or the Development Services Scheme. Other authorities also ultimately cover the cost for the installation of critical infrastructure. As such, the wording should be general enough to cover such instances.

**Amend the second last dot point in R60 to: Infrastructure as required by utility service provided including water, sewerage, drainage, electricity, and telecommunications except where the item is funded by the utility provider, such as, but not limited to a Development Services Scheme.**

- The Place Based Plan identifies the 'DSS investigation area' – with no information advising what that is for or how that area is to be considered, only creating uncertainty.

**Delete the identified 'DSS investigation area' from Plan 3 - Place Based Plan in the OSEPSP.**



## Conclusion

OSEP is a designated State Significant Industrial Precinct (SSIP) and a Regionally Significant Commercial Area (RSCA). The PSP objectives clearly promotes industrial and employment land as the priority, as does the PSP Vision.

The proposed staging plan and the funding gaps identified will not deliver priority employment precinct in the near future, if at all given the lack of a plan for the delivery of bridge infrastructure. On the contrary, the proposed staging advances the delivery of residential land and suspends the construction of any employment land indefinitely. Influences that have seemingly shaped the SSIP have also found to be unfounded, based on high-level desk-top assessments and risk optimising land-use opportunities within the Precinct.

This submission advocates for a land use outcome that maximises to its full extent, the development potential of 345 Officer South Road and the broader Precinct to facilitate Industrial and employment uses. The submission identifies critical infrastructure required on the land in the early stages of development of the precinct. Recommendations are provided to facilitate a more logical subdivision design suitable for large scale industrial uses. The recommendations resolve conflicts between critical infrastructure required on the land through the relocation of road. The submission also identifies efficiencies in construction costs and reduced land areas by maximising the use of existing infrastructure and in particular, Officer South Road.

### Requested Changes

- Restrictive staging of the precinct should not be applied, enabling the bringing forward of key infrastructure in strategic locations for the benefit of the wider precinct, and enabling larger landholdings with the capacity to undertake works in kind to proceed early in the development of the precinct.
- If restrictive staging is pursued, include 345 Officer South Road within Stage 1 of the PSP Plan 12 and removed from the SCO to ensure efficient and timely development of the precinct, as should any land to the west required for the Thompsons Road and Officer South Road intersection delivery.
- Remove BR-01 from any requirements prior to the development of industrial land in the SCO.
- Apply the PAO to the land required to facilitate the Zone Substation. The PAO is the most appropriate planning control to apply to land to facilitate critical infrastructure.
- Apply the PAO to BR-04 to ensure the acquisition and construction of the bridge crossing can occur at the earliest possible time if the land within which it is located is not being developed.
- Apply the PAO for the Thompsons Road reservation from at least BR-04 to the Officer South Road alignment to enable an alternate shorter term access solution to the SSIP if IN-13 is unreasonably delayed.
- Re-locate Thompsons Road to the Option A alignment.
- Determine if the land identified under the PAO is definitely required and if not, delete the PAO, prior to the finalisation of Amendment C274card.
- If determined that a 70m reservation is required, include the ultimate 70m land reservation for Thompsons Road within the ICP.
- If the PAO is required and only applies to the 29m, apply 14.5m either side of the 41m Thompsons Road alignment or revise the 70m cross-section accordingly for Primary Arterial 6 Lane – Thompsons Road.
- GAIC Works-in-Kind should be encouraged to facilitate the delivery of significant State infrastructure.
- Reduce proposed HO-91 so as its eastern boundary is approximately 100-120m from the existing homestead on the land.
- Relocate Officer South Road to its current alignment and widen as required in both the OSESP and ICP to enable the 41m ultimate road reservation. All trees in this location to be removed.
- Relocate POS within the designated Industrial Zone as shown on PSP Plan 3: Place Based Plan to the gas and electricity easements.
- Rezone the gas easement to the Special Use Zone to reflect the use and development potential of land within the gas easement.
- Amend the UGZ-7 to allow the issuing of a planning permit for a childcare centre in the C2Z and to prohibit the use of a child care centre in the IN1Z.

- **Modify PSP G3 to: The front setback of commercial and industrial premises should be landscaped with canopy trees where practical and vegetation to promote water sensitive urban design and to help reduce the impact of the urban heat island effect.**
- **Split PSP R14 into two parts, a Requirement: Commercial, industrial and retail premises loading and storage areas must be provided at either the side or rear of the building; and a Guideline: Commercial, industrial and retail premises at-grade parking should be provided to the side of the building, with direct pedestrian paths connecting off-street car parks to the primary entrances of buildings.**
- **Amend the preamble of PSP R17 to: Unless provided with the application, a condition of any permit issued for the subdivision of land within the PSP area must require a Landscape Plan to be submitted to the Responsible Authority for approval. The Landscape Plan must illustrate and quantify canopy tree coverage within the public realm and open space to an average of 30 per cent (excluding areas dedicated to biodiversity or native vegetation conservation).**
- **Amend the preamble of PSP R18 to: Development must provide for a minimum 19 metre perimeter road bushfire interface at the conservation area boundary, drainage reserves, constructed waterways and the southern and south-east boundary adjoining the Green Wedge...**
- **Amend R24 to: On land where cultural heritage is identified, the Cultural Heritage Management Plan must include a recommendation that naming opportunities for streets, parks, wetlands or conservation zones, community or local town centres must be given To Traditional Owners, represented by BLCAC.**
- **Amend the second last dot point in R60 to: Infrastructure as required by utility service provided including water, sewerage, drainage, gas, electricity, and telecommunications except where the item is funded by the utility provider, such as, but not limited to a Development Services Scheme.**
- **Delete the identified 'DSS investigation area' from Plan 3 - Place Based Plan in the OSESP.**



## ANNEXURE A

Proposed SCO Changes



# State Infrastructure OFFICER SOUTH EMPLOYMENT PRECINCT

Draft Incorporated Document  
September 2023



## 1. INTRODUCTION

- 1.1 This document is an incorporated document in the Cardinia Planning Scheme (the **Planning Scheme**) pursuant to section 6(2)(j) of the *Planning and Environment Act 1987*.
- 1.2 Despite any provision to the contrary in the Planning Scheme, pursuant to clause 45.12 of the Planning Scheme, the land identified in this document may be developed in accordance with the specific controls contained in this document. If there is any inconsistency between the specific controls contained in this document and the general provisions of the Planning Scheme, the specific controls in this document prevail.
- 1.3 In this document the **Infrastructure Items** are defined as follows:
- a. The **Lecky Road Bridge** means a completed secondary arterial road bridge (interim standard) across Lower Gum Scrub Creek. This item is referred to as BR-01 on Map 1: *Plan 12 Infrastructure and Development and Staging*.
  - b. The **Thompsons Road (East) Bridge** means a completed primary arterial road bridge (interim standard) across Lower Gum Scrub Creek. This item is referred to as BR-02 on Map 1: *Plan 12 Infrastructure and Development Staging*.
  - c. The **Officer South Freeway Interchange Intersection** means a signalised intersection (ultimate) from Officer South Road and the Princes Freeway. This item is referred to as IN-13 on Map 1: *Plan 12 Infrastructure and Development Staging*.
  - d. The **Grices Road Bridge** means a completed secondary arterial road bridge (ultimate standard) across Cardinia Creek. This item is referred to as BR-03 on Map 1: *Plan 12 Infrastructure and Development Staging*.
  - e. The **Thompsons Road (West) Bridge** means a completed primary arterial road bridge (ultimate standard) across Cardinia Creek. This item is referred to as BR-04 on Map 1: *Plan 12 Infrastructure and Development Staging*.
- 1.4 **Officer South Employment PSP** means the Office South Employment Precinct Structure Plan, being an incorporated document under the Planning Scheme.

## 2. THE LAND TO WHICH THIS INCORPORATED DOCUMENT APPLIES

- 2.1 The land is identified as stages 2, 3 and 4 on Map 1 of this document and mapped SCO14 by Clause 45.12 Specific Controls Overlay within the Planning Scheme.

## 3. BACKGROUND AND PURPOSE

- 3.1. The background to this document is that:
- a. The existing road network does not have sufficient capacity to accommodate the additional traffic demand that is anticipated to be generated from new development within the Officer South Employment PSP.
  - b. The Infrastructure Items will form the basis of a safe and efficient road network, which provides access to the Officer South Employment precinct area from established surrounding areas to the east and west as well as access to the Princes Freeway, one of Victoria's key freight routes.
  - c. The delivery of these Infrastructure Items will ensure development within the Officer South Employment PSP and growth of the South East Growth Corridor is supported by adequate transport infrastructure and avoid inappropriate and unsafe traffic impacts.



3.2. The purpose of this document is to:

- a. Ensure the use and development of land within Stages 2, 3 and 4 of the Officer South Employment PSP does not precede the delivery of the identified Infrastructure Items.
- b. Enable existing uses to continue to operate, and limited development to occur, on the basis that this would not generate the need for the new Infrastructure Items as set out in this document.

**4. SPECIFIC CONTROLS**

Permit Requirements

Unless otherwise agreed by the relevant authorities,

- a) A permit must not be granted for use or development of land in stage 2 on Map 1 until the ~~Lecky Road bridge (BR-01) and Officer South Freeway interchange intersection (IN-13) are both~~<sup>IS</sup> delivered to the satisfaction of the Head Transport for Victoria and the Minister for Planning.
- b) A permit must not be granted to use or develop land in stage 3 on Map 1 until the Thompsons Road (east) (BR-02) and the Grices Road bridge (BR-03) are both delivered to the satisfaction of the Head, Transport for Victoria and the Minister for Planning.
- c) A permit must not be granted to use or develop land in stage 4 on Map 1 until the Thompsons Road (west) bridge (BR-04) is delivered to the satisfaction of the Head, Transport for Victoria and the Minister for Planning.
- d) Despite the provisions of Section 4(a), 4(b) and 4(c) of this Incorporated Document, a permit may be granted to use or develop land in accordance with the provisions of Clause 37.07-1 to 37.07-8 (Urban Growth Zone Part A) as if no precinct structure plan applied to the land covered by this Specific Controls Overlay.
- e) <sup>A permit must not be granted to use or develop land with an applied Residential Growth Zone under the provisions of Clause 2.2 of Schedule 7 of the Urban Growth Zone until the Lecky Road bridge (BR-01) is delivered to the satisfaction of the Head, Transport for Victoria and the Minister for Planning.</sup>

**5. REQUIREMENTS FOR PERMITS**

None specified.

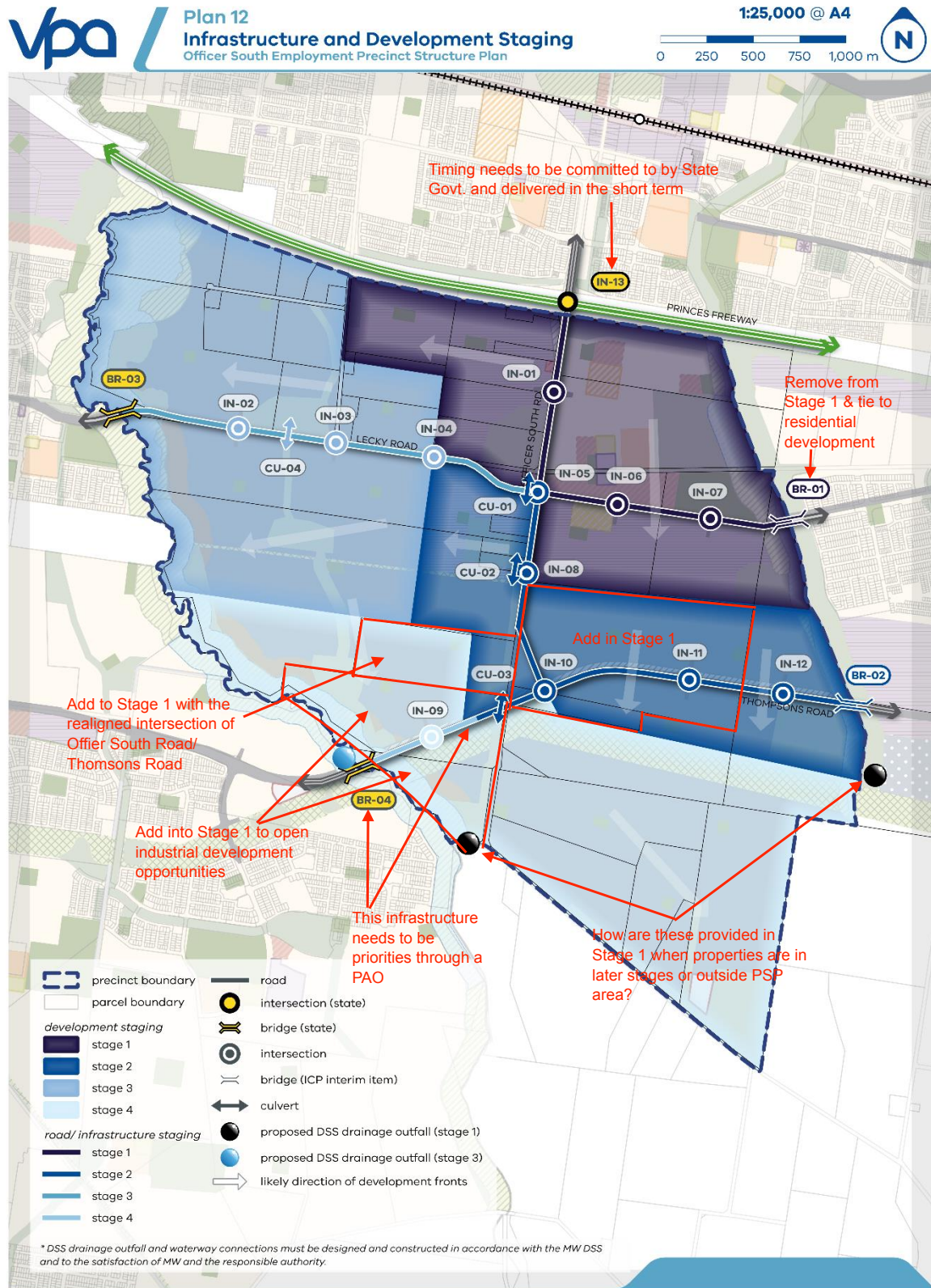
**6. EXPIRY OF THIS DOCUMENT**

6.1. This incorporated document will expire on the earlier of:

- a) Receipt by the Responsible Authority of a letter from the Head, Transport for Victoria confirming that:
  - a. construction of the relevant state infrastructure item/s for the specific stage has commenced; and
  - b. the Head, Transport for Victoria considers the prohibition under Clause 4(a), 4(b) and 4(c) of this document is no longer required; or
- b) Upon the opening of the relevant Infrastructure Item/s for the specific stage to traffic.



MAP 1: Officer South Employment PSP Staging



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## ANNEXURE B

Cardinia Park, Former Gin Gin Bean Pre-Emptive Right Site



## **CARDINIA PARK, FORMER GIN GIN BEAN PRE-EMPTIVE RIGHT SITE**

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**Farm Complex site**

**410 Officer South Road, Officer**

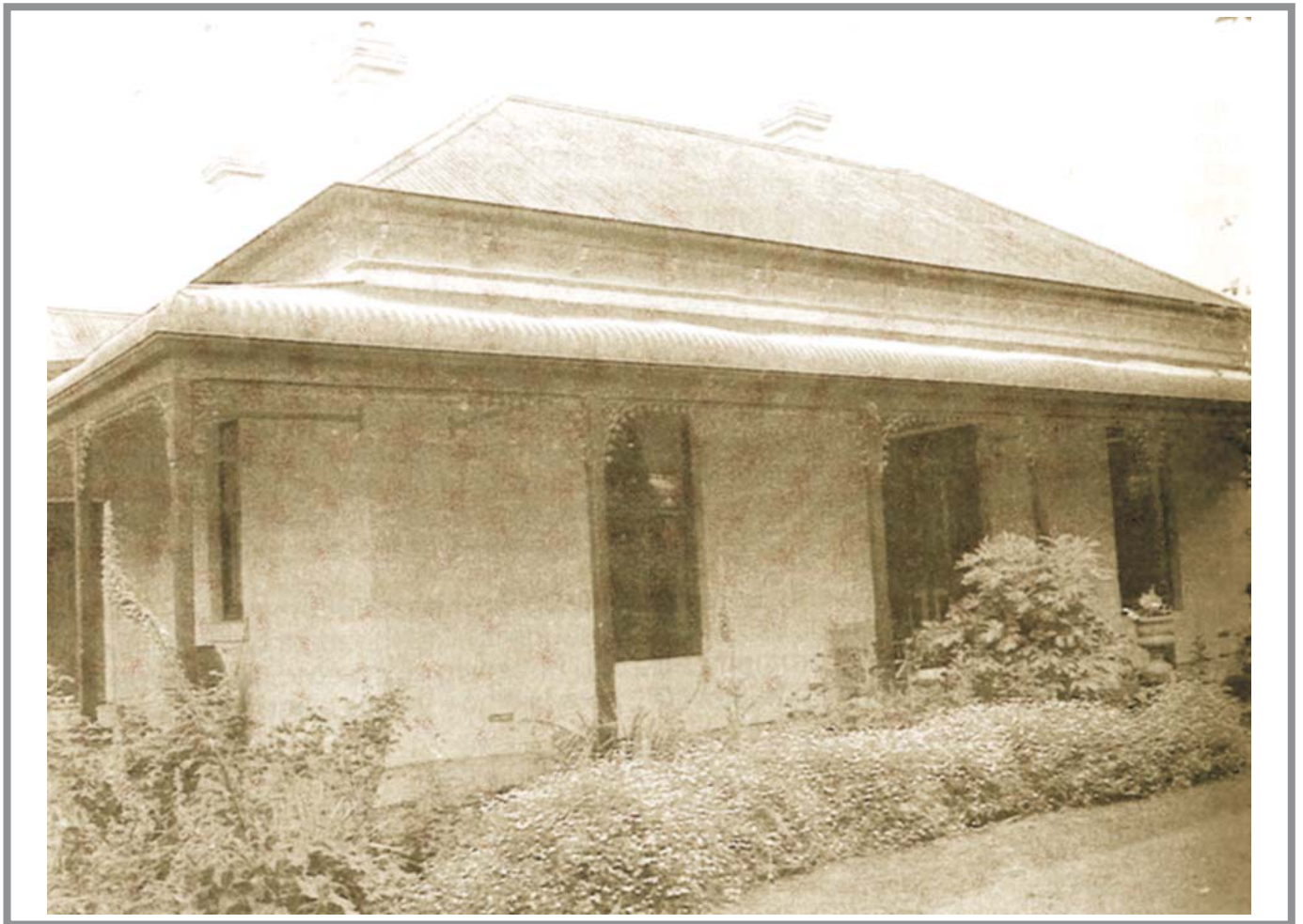
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**VALUE: Regional (Cardinia Shire)**

**ESTIMATED DATE: 1870s, c1914**

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MAP: 23  
EAST AMG: 359000  
NORTH AMG: 5782000  
HISTORICAL THEMES: 3.1,10.2  
**ASSOCIATED PERSONS: Lecky, James**





## HISTORY

This property, which was associated with the Lecky family over a long period, has associations with the Shire's earliest pastoral history. Its site was once part of the Gin Gin Bean pastoral run held in 1840 by J.F. Turnbull and H. Reoch, and covered 7,000 acres.<sup>1</sup> Present day Officer is located on the site of that run.<sup>2</sup>

James Lecky, pastoralist, held the Gin Gin Bean Lease in 1846 and in 1853 applied for the pre-emptive right to his homestead block.<sup>3</sup> An 1855 surveyor's plan of the '640 acres marked for James Lecky' shows the homestead paddock on a flat 'abundant with grass' and beyond, land '...wooded with gums and oaks.' Beyond his fences, 'open forest land' is indicated.<sup>4</sup> Lecky became the Crown Grantee for the pre-emptive right Allotment A in the Parish of Pakenham.<sup>5</sup> He also bought other allotments nearby.<sup>6</sup>

According to family records, after he secured his Crown Grant (1855), Lecky built a more substantial homestead, known as Cardinia Park. The present house was built in three stages. The brick front dates from the 1870s, the weatherboard section at the rear from the turn of the century, and the kitchen from the First World War period.<sup>7</sup>

A search of district rate books confirmed that in 1875, Robert S. and James Leckey (sic), farmers, owned 1160 acres at Gin Gin Bean with the substantial valuation of £185.<sup>8</sup> These rate books did not list homes on properties until the late 1880s. During that decade, the valuation on the Lecky properties rose steadily until by 1887-88, it had reached £270.<sup>9</sup> The following, 1888 boom year, it had risen to £464 and the next year, when it decreased slightly to £406, a house was listed.<sup>10</sup> From this date, the Leckys were described as 'graziers.' There is no confirmation of additions to the homestead at the turn of the century in rate records. By 1910-11, the valuation had fallen to £246.<sup>11</sup> However, there was a big increase in valuation in 1913-14, which may confirm the World War I additions.<sup>12</sup> There is a domed well in the garden.

The history of the Lecky family is linked also with the origins of the Officer township. Lecky senior has been called Officer's first permanent settler. He arrived with his wife and family from Dublin in 1841. After 5 years at Greensborough, Lecky came to the Gin Gin Bean run. He was interested in civic matters and was a member of the first Cranbourne Road Board formed in 1861, and was First President of Cranbourne Shire Council.<sup>13</sup> The Leckys were outstanding horsemen, according to one account, breeding and racing thoroughbred horses. They also bred Clydesdales and fattened stock on the rich pasture land. Two Lecky sons were killed in the 1914-18 War.<sup>14</sup>

The Leckys owned the Cardinia Park property until the 1930s, when it was purchased by the Dodson family. This family came from Leeton in New South Wales and settled at Cardinia Park on St. Patrick's Day 1936. George and Elizabeth Dodson purchased 703 acres from James Lecky Jun. The Dodsons used the property mainly for sheep farming and dairying. In the dairying section of the property, the bails were made of tea-tree. George died in 1976, aged 84, but his wife continued to live on the property.

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1 Billis and Kenyon, p.211  
2 *In the Wake of the Pack Tracks*, p.130  
3 Gin Gin Bean Run File  
4 PR Plan G27  
5 RGO Search 42820  
6 RGO Search 42820  
7 Letter from Audrey J. Dodson to the Shire, 15 December 1994  
8 Shire of Berwick RB 1875-76, Pakenham Riding No. 40  
9 Shire of Berwick RB 1887-88, Pakenham Riding No. 180  
10 Shire of Berwick RB 1888-89 No. 181; 18890-90 No. 230  
11 Shire of Berwick RB 1910-11, No. 2102  
12 Shire of Berwick RB 1913-14, Nos. 783,784  
13 *In the Wake of the Pack Tracks*, p.130  
14 *In the Wake of the Pack Tracks*, p.11



A recent history of Cardinia and district contains a 1936 photo of the house at Cardinia Park with George Dodson in the foreground.<sup>1</sup> This view shows a double-fronted stuccoed and verandahed house with an arrow-head picket fence across the front of the house yard. Mrs. Dodson (of Lecky at 330 Officer South Road), in a recent letter to the Cardinia Shire, told how her father-in-law purchased the 703 acres of the Lecky property. It has since been subdivided. She explains: We have 300+ acres on which we run a dairy farm. My son has 62 acres. My sister-in-law has 100 acres on which the old homestead is situated, and 200 acres was sold - the lot nearest Lecky Road.<sup>2</sup>

## DESCRIPTION

This house is near or at the site of an old pastoral complex, set on the Cardinia Creek, and well in from the road. The present house was reputedly built in three stages and this matches the physical evidence. The brick front is thought to date from the 1870s, the weatherboard section at the rear from the turn of the century, and the kitchen from the First World War period.

The front section is a typical conservative stuccoed Italianate styled and verandahed villa with a corrugated iron clad hipped roof and Edwardian-era bullnose profile verandah (later). The front threshold is set well above the verandah floor level indicating that it once opened onto a timber verandah which has since been removed. The house has the typical four main rooms either side of a central passage as reflected by the symmetrically arranged double-hung windows facing the front and the cemented ornamental chimneys.

The rear verandah supported on turned timber posts typical of the Edwardian-era and is faced by an altered weatherboard section of the house. There is a huge dome-topped well to one side of the house in the garden which presumably served the kitchen. A reconstructed pleasure garden is at the front of the house with some mature plantings. There is no indication of mature trees which might have lined the long driveway into the house. Well removed from the house are corrugated iron clad out-buildings which appear of more recent construction.

## CONDITION

Given the various stages of construction, generally externally original.

## CONTEXT

The house and out-buildings are set in open pasture well in from the road and close to the Cardinia Creek.

## SIGNIFICANCE:

Cardinia Park, the former Gin Gin Bean Pre-emptive Right, is significant to the Cardinia Shire as an early house connected with the pioneering pastoral period in the district and closely related to the later early farming activity on this property. The house is thought to be among the oldest in the shire and this is supported by a reasonably well preserved front wing

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<sup>1</sup> Eileen M. Williams and Jew Beard. *Look to the Rising Sun A History of Cardinia*, 1984, p.37  
<sup>2</sup> Letter, Mrs. Dodson to Shire, 15 December 1994



which is complemented by a later Edwardian-era wing, thus reflecting stages in the Lecky ownership of the property. The Lecky family was associated with this property from a very early date, James Lecky, the pastoralist, holding the Gin Gin Bean lease from 1846.



## ANNEXURE C

Ecolink Ecological Merit Assessment



Simon Scott  
Principal Ecologist  
Ecolink Consulting Pty Ltd  
PO Box 356  
Northcote VIC 3070

Our Ref: 2361

24 October 2023

Abiwood OSR Pty Ltd

C/- Fiona Wiffrie  
Principal Town Planner – Melbourne  
Beveridge Williams  
1 Glenferrie Road  
Malvern VIC 3144

Dear Fiona,

**Re: Tree Ecological Merits Assessment, 345 Officer South Road, Officer South, Victoria**

Ecolink Consulting Pty Ltd was engaged to determine the ecological merits of trees located along the road frontage of 345 Officer South Road, Officer South (the study area).

**Purpose**

The purpose of the assessment was to assess the:

- Provenance of the vegetation;
- Quality of any indigenous patches of native vegetation within the study area;
- Presence of any indigenous trees; and
- Ecological merit of the vegetation being retained.

**Background**

The study area is located within the Officer South Employment Precinct Structure Plan (PSP) area. The Officer South Employment PSP is currently in draft format and public consultation on the document is open until 27 October 2023.

The study area is part of Property 36 of the draft Officer South Employment PSP, which is generally nominated for future industrial development (Victorian Planning Authority 2023).



Plan 2 of the draft Officer South Employment PSP shows trees within the study area that are classified as 'high value trees'. Plan 7 of the draft Officer South Employment PSP shows six high value trees to be retained within the study area, although it is unclear exactly which trees these are (Victorian Planning Authority 2023). Depending on which trees are nominated for retention, the retention of these trees may require the deviation of the Officer South Road around the trees, to avoid impacts (Victorian Planning Authority 2023).

The PSP states that *'existing high, very high and potential high value trees, as per Plan 2 and Plan 7, must be retained within public open space, including road reserves, biolink and the public realm where possible'* (Victorian Planning Authority 2023).

An arboricultural assessment of the trees, used to prepare the draft Officer South Employment PSP, was completed by Homewood Consulting Pty Ltd (Homewood Consulting Pty Ltd 2020). The arborist identified 22 trees with a High Retention Value within the study area (Trees 48-69).

## **Methods**

### *Desktop Assessment*

The desktop assessment was undertaken to review the historic ecological values of the vegetation within the study area from the following literature:

- The Officer South Employment PSP;
- The Officer South Employment Native Vegetation Precinct Plan;
- The arboricultural assessment previously completed within the study area by Homewood Consulting Pty Ltd (2020).

### *Site Assessment*

A site assessment was completed by Simon Scott, Principal Ecologist, Ecolink Consulting Pty Ltd on 17 October 2023. Simon is suitably qualified and experienced and holds a current Vegetation Quality Assessors Accreditation (Department of Environment Land Water and Planning 2023).

All flora species observed within the study area were recorded, with the exception of planted vegetation that was not considered a 'weed' (i.e. planted vegetation that was not spreading or reproducing). Where a species was not able to be confidently identified in the field, a sample was collected and later identified. Plants were identified to species level wherever possible, however, some plants that were planted, cultivars, hybrids, or plants that did not contain suitable fertile material used for identification were recorded to genus level.

The Guidelines require that information regarding the biodiversity values of the site are obtained through:

- Site-based information that can be measured or observed at a site, including:
  - Extent of native vegetation patches;
  - Large trees;



- Native vegetation condition assessed in accordance with the *Vegetation Quality Assessment Manual – Guidelines for Applying the Habitat Hectares Scoring Method* (Department of Sustainability and Environment 2004);
- Ecological Vegetation Classes (EVC); and
- Sensitive wetlands and coastal areas.
- Landscape scale information that cannot be measured or observed at the site and includes maps and models procured from DEECA.

The landscape context has been used to inform an assessment of the ecological merit of the trees within the landscape.

A Habitat Hectare assessment was undertaken in accordance with the methodology prescribed within the *Vegetation Quality Assessment Manual – Guidelines for Applying the Habitat Hectares Scoring Method* (Department of Sustainability and Environment 2004) at patches<sup>1</sup> of vegetation (Department of Sustainability and Environment 2004). In addition, the location and species of threatened<sup>2</sup> species, or indigenous ‘scattered trees’<sup>3</sup>, and any ‘large trees’<sup>4</sup> were mapped using a hand-held GPS (accuracy +/- 5 m).

## Results

A total of 17 flora species were recorded during the current assessment. All of the understorey species were exotic, and only one non-indigenous, Victorian native species was recorded (Table 1).

The understorey was very sparse due to the dense canopy of overstorey trees, and the high amount of ground leaf litter (Plate 1). The understorey was dominated by Panic Veldt-grass *Ehrharta longiflora*. Other widespread species included Blackberry *Rubus fruticosus* spp agg. Yorkshire Fog *Holcus lanatus*, Brown-top Bent *Agrostis capillaris*, and Sweet Vernal-grass *Anthoxanthum odoratum* (Plate 1). The vegetation did not classify as a ‘patch’ of native vegetation under the *Guidelines of the Removal Destruction or Lopping of Native Vegetation* (Department of Environment Land Water and Planning 2017).

The arborist has determined that the overstorey vegetation within the study area comprises a group of trees (Plate 2). The arborist has identified 22 of these trees as having High Retention Value (Homewood Consulting Pty Ltd 2020). The 22 trees are likely to have a Useful Life Expectance exceeding 10 years and in some case over 40 years. The arborist has also determined that the trees are generally structurally sound, and have a high amenity value. Tree 68 had some potential habitat value for fauna (possibly because of a stick nest or spout, as was observed during

<sup>1</sup> A ‘patch’ is defined as an area with at least 25% cover abundance of perennial native vegetation, or a group (i.e. three or more) trees forming a continuous canopy.

<sup>2</sup> Threatened species include those listed on the EPBC Act, FFG Act or state Advisory Lists

<sup>3</sup> Scattered trees are defined as a native canopy tree that does not form a patch

<sup>4</sup> Large trees are defined as meeting the size threshold specified in the bioregional EVC Benchmark



the current assessment (Homewood Consulting Pty Ltd 2020)). The results of the arborists assessment are summarised in Table 2.

Consistent with the arborists' report, the current assessment found that all of the trees within the study area were Southern Mahogany *Eucalyptus botryoides* or Monterey Cypress *Hesperocyparis macrocarpa* (Table 2). None of the trees were indigenous. Southern Mahogany is a Victorian Native tree, indigenous to East Gippsland, east of approximately Loch Sport, as well as southern New South Wales (Royal Botanic Gardens Melbourne 2023). It is a widespread planted tree throughout Victoria. Monterey Cypress is exotic, and is also planted widely throughout Victoria (Royal Botanic Gardens Melbourne 2023). Therefore, none of the trees were classified as 'scattered trees' or 'Large trees' under the *Guidelines for the Removal, Destruction or Lopping of Native Vegetation* (Department of Environment Land Water and Planning 2017).

It is apparent that the trees have been planted to provide a shelterbelt for livestock, and for amenity purposes: providing a screen between Officer South Road and the dwelling. The trees were roughly located in two rows, with roughly equidistant spacing between the trees and the rows (Plate 3).

A disused stick nest was observed in the southern-most tree, Tree 64. It is likely that this was used and abandoned by a native bird such as an Australian Magpie *Gymnorhina tibicen* or Nosy Miner *Manorina melanocephala*, both of which were recorded within the study area. No tree hollows were observed within any of the trees, however, shallow tree spouts were created where the branches of the Monterey Cypress trees had snapped off. Other bird species observed included Magpie-lark *Grallina cyanoleuca* and Willie Wagtail *Rhipidura leucophrys*. These bird species are common and widespread throughout peri-urban and rural areas of greater Melbourne. Birds, bats and arboreal mammals such as Common Ringtail Possum may use the trees as habitats. The fauna species utilising the trees would be common to the local area. Fauna salvage would be recommended prior to the removal of trees which contain habitat for fauna.

The exotic understorey vegetation and the planted non-indigenous vegetation is unlikely to provide habitat for threatened flora species and is unlikely to provide important habitats for threatened fauna species.

From an ecological perspective, amenity trees that provide similar ecological value to those within the study area could be offset by planting new trees. The requirement for amenity planting is consistent with the draft Officer South Employment PSP which states that additional planting and landscape design should follow the Cardinia Shire Council's *Developer landscape guidelines – January 2017* (Victorian Planning Authority 2023).

The trees are generally isolated within the landscape. They are present along the road frontage, and disjunct rows of trees have been planted along fencelines elsewhere within the property. In They adjoin a patch of native vegetation associated with an open stormwater drain running down the eastern side of Officer South Road. The trees are not identified as a 'biolink' within the draft Officer South Employment PSP (Victorian Planning Authority 2023). Plan 7 of the draft Officer South Employment PSP shows that the vast majority of the patch of native vegetation associated

with Officer South Road is proposed to be removed and the trees to the east of the study area (within the same property) are also proposed to be removed (Victorian Planning Authority 2023). On this basis, the trees currently shown for retention within the study area would be isolated within an industrial development, post-development, which would further diminish their value to fauna within the landscape.

As non-indigenous, planted trees, they would currently be able to be removed without a permit from the Cardinia Shire Council (Table 2).

On the basis of the above, the trees therefore are considered to be of low ecological merit.

## Conclusion

The current assessment has assessed the ecological merit of the trees, not just the integrity and amenity of the trees. It is our determination that the trees are of low ecological merit on the basis that:

- The vegetation within the study area is highly modified from its pre-European state, due to historic and ongoing land uses;
- The trees within the study area not indigenous to the study area;
- The trees within the study area have been planted for amenity purposes;
- They provide habitats to locally common fauna species, but are unlikely to provide habitats for threatened flora species, and are unlikely to provide important habitats for threatened fauna species;
- They do not constitute a patch of native vegetation, and are not classified as scattered trees under the *Guidelines for the Removal Destruction or Lopping of Native Vegetation*;
- As planted non-indigenous vegetation, they do not currently require a permit for their removal; and
- The trees are currently relatively isolated within the landscape and do not provide a habitat corridor or bioink. They will be further isolated post development.

To mitigate the minor ecological impacts of the tree removal from the study area, fauna should be salvaged from the trees, consistent with the *Wildlife Act 1977* (Vic), and amenity trees could be planted in accordance with the Cardinia Shire Council's *Developer landscape guidelines – January 2017*. It is concluded that the trees are therefore not worthy of retention from an ecological perspective.

I trust the above meets with your expectations, but please contact me if you have any queries.

Kind regards,

A handwritten signature in blue ink, appearing to read 'Simon Scott', on a light blue background.

Simon Scott  
Principal Ecologist



## References

- Department of Environment Land Water and Planning (2017). 'Guidelines for the Removal, Destruction or Lopping of Native Vegetation.' (Department of Environment Land Water and Planning: Melbourne).
- Department of Environment Land Water and Planning (2023). Vegetation Quality Assessment list of accredited assessors. Available at [https://www.environment.vic.gov.au/\\_data/assets/pdf\\_file/0026/51785/DELWP-VQA-AccreditedAssessorList8July2019.wbk.pdf](https://www.environment.vic.gov.au/_data/assets/pdf_file/0026/51785/DELWP-VQA-AccreditedAssessorList8July2019.wbk.pdf). Accessed January 2023. Department of Environment, Land, Water and Planning, Melbourne.
- Department of Sustainability and Environment (2004). 'Habitat Hectares Native Vegetation: Sustaining a Living Landscape. Vegetation Quality Assessment Manual – Guidelines for Applying the Habitat Hectares Scoring Method. Version 1.3.' (Department of Sustainability and Environment: Melbourne).
- Homewood Consulting Pty Ltd (2020). 'Assessment of trees within the proposed Officer South Employment Precinct.' Homewood Consulting Pty Ltd, Thomastown.
- Royal Botanic Gardens Melbourne (2023). Flora of Victoria. Available at <https://vicflora.rbg.vic.gov.au/>. Accessed 2023. Melbourne.
- Victorian Planning Authority (2023). 'Officer South Employment Precinct Structure Plan; Draft for Public Comment.' Victorian Planning Authority, Melbourne.

## Plates



**Plate 1.** A sparse understorey within the study area, generally dominated by exotic Panic Veldt-grass



**Plate 2.** The group of trees included within the study area. The overstorey was dominated by exotic Monterey Cypress





**Plate 3.** Cypress trees generally planted in two rows

## Tables

**Table 1.** Flora recorded within the study area during the assessment

Origin	Common Name	Scientific Name
*	Brown-top Bent	<i>Agrostis capillaris</i>
*	Angled Onion	<i>Allium triquetrum</i>
*	Sweet Vernal-grass	<i>Anthoxanthum odoratum</i>
*	Turnip	<i>Brassica</i> spp.
*	Lesser Quaking-grass	<i>Briza minor</i>
*	Panic Veldt-grass	<i>Ehrharta erecta</i>
*	Annual Veldt-grass	<i>Ehrharta longiflora</i>
p #	Southern Mahogany	<i>Eucalyptus botryoides</i>
p *	Monterey Cypress	<i>Hesperocyparis macrocarpa</i>
*	Yorkshire Fog	<i>Holcus lanatus</i>
*	African Box-thorn	<i>Lycium ferocissimum</i>
*	Paspalum	<i>Paspalum dilatatum</i>
*	Blackberry	<i>Rubus fruticosus</i> spp. agg.
*	Curled Dock	<i>Rumex crispus</i>
*	Common Sow-thistle	<i>Sonchus oleraceus</i>
*	Rat-tail Grass	<i>Sporobolus africanus</i>
*	White Clover	<i>Trifolium repens</i> var. <i>repens</i>

\* exotic

p planted

# naturalised within the study area



**Table 2.** High Retention Value Trees within the study area identified by the arborist (Source: Homewood Consulting Pty Ltd 2020)

Tree	Common Name	Species Name	Provenance	Size (DBH cm)	Useful Life Expectancy	Retention Value	Significance	Triggered by Clause 52.17?	Ecological Merit
48	Southern Mahogany	<i>Eucalyptus botryoides</i>	Victorian native (non-indigenous)	106	10-20	High	None	No	Low
49	Southern Mahogany	<i>Eucalyptus botryoides</i>	Victorian native (non-indigenous)	54	20-40	High	None	No	Low
50	Monterey Cypress	<i>Hesperocyparis macrocarpa</i>	Exotic	131	20-40	High	None	No	Low
51	Monterey Cypress	<i>Hesperocyparis macrocarpa</i>	Exotic	87	20-40	High	None	No	Low
52	Monterey Cypress	<i>Hesperocyparis macrocarpa</i>	Exotic	76	40+	High	None	No	Low
53	Monterey Cypress	<i>Hesperocyparis macrocarpa</i>	Exotic	86	20-40	High	None	No	Low
54	Monterey Cypress	<i>Hesperocyparis macrocarpa</i>	Exotic	93	20-40	High	None	No	Low
55	Monterey Cypress	<i>Hesperocyparis macrocarpa</i>	Exotic	79	10-20	High	None	No	Low
56	Monterey Cypress	<i>Hesperocyparis macrocarpa</i>	Exotic	79	20-40	High	None	No	Low
57	Monterey Cypress	<i>Hesperocyparis macrocarpa</i>	Exotic	106	20-40	High	None	No	Low
58	Monterey Cypress	<i>Hesperocyparis macrocarpa</i>	Exotic	108	10-20	High	None	No	Low
59	Monterey Cypress	<i>Hesperocyparis macrocarpa</i>	Exotic	130	10-20	High	None	No	Low

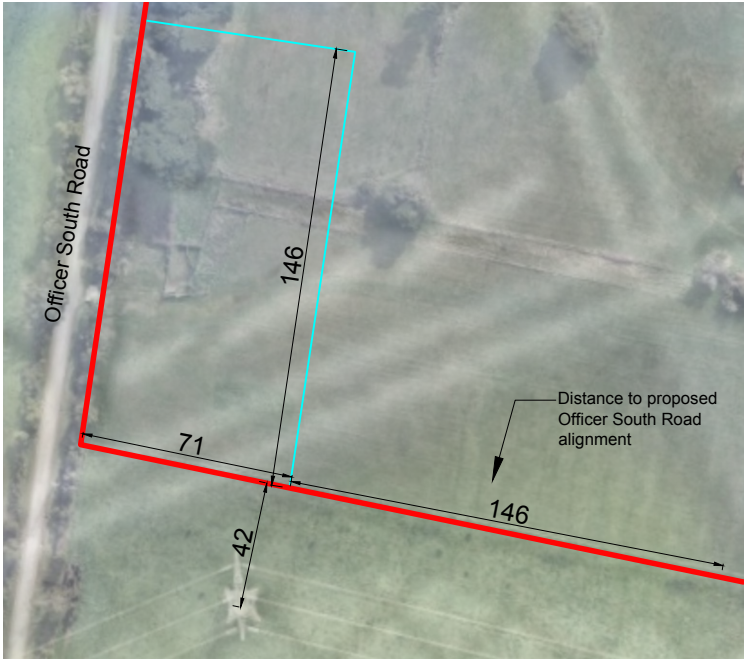
Tree	Common Name	Species Name	Provenance	Size (DBH cm)	Useful Life Expectancy	Retention Value	Significance	Triggered by Clause 52.17?	Ecological Merit
60	Monterey Cypress	<i>Hesperocyparis macrocarpa</i>	Exotic	105	20-40	High	None	No	Low
61	Monterey Cypress	<i>Hesperocyparis macrocarpa</i>	Exotic	120	10-20	High	None	No	Low
62	Monterey Cypress	<i>Hesperocyparis macrocarpa</i>	Exotic	106	10-20	High	None	No	Low
63	Monterey Cypress	<i>Hesperocyparis macrocarpa</i>	Exotic	53	40+	High	None	No	Low
64	Monterey Cypress	<i>Hesperocyparis macrocarpa</i>	Exotic	91	20-40	High	None	No	Low
65	Southern Mahogany	<i>Eucalyptus botryoides</i>	Victorian native (non-indigenous)	68	20-40	High	None	No	Low
66	Southern Mahogany	<i>Eucalyptus botryoides</i>	Victorian native (non-indigenous)	73	10-20	High	None	No	Low
67	Southern Mahogany	<i>Eucalyptus botryoides</i>	Victorian native (non-indigenous)	61	10-20	High	None	No	Low
68	Southern Mahogany	<i>Eucalyptus botryoides</i>	Victorian native (non-indigenous)	75	10-20	High	Potential habitat value	No	Low
69	Southern Mahogany	<i>Eucalyptus botryoides</i>	Victorian native (non-indigenous)	73	10-20	High	None	No	Low



## ANNEXURE D

Beveridge Williams Analysis Plans



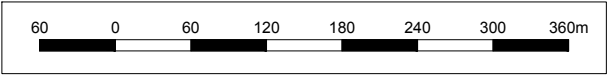


PAO9 - 1ha AusNet substation - 1:2500

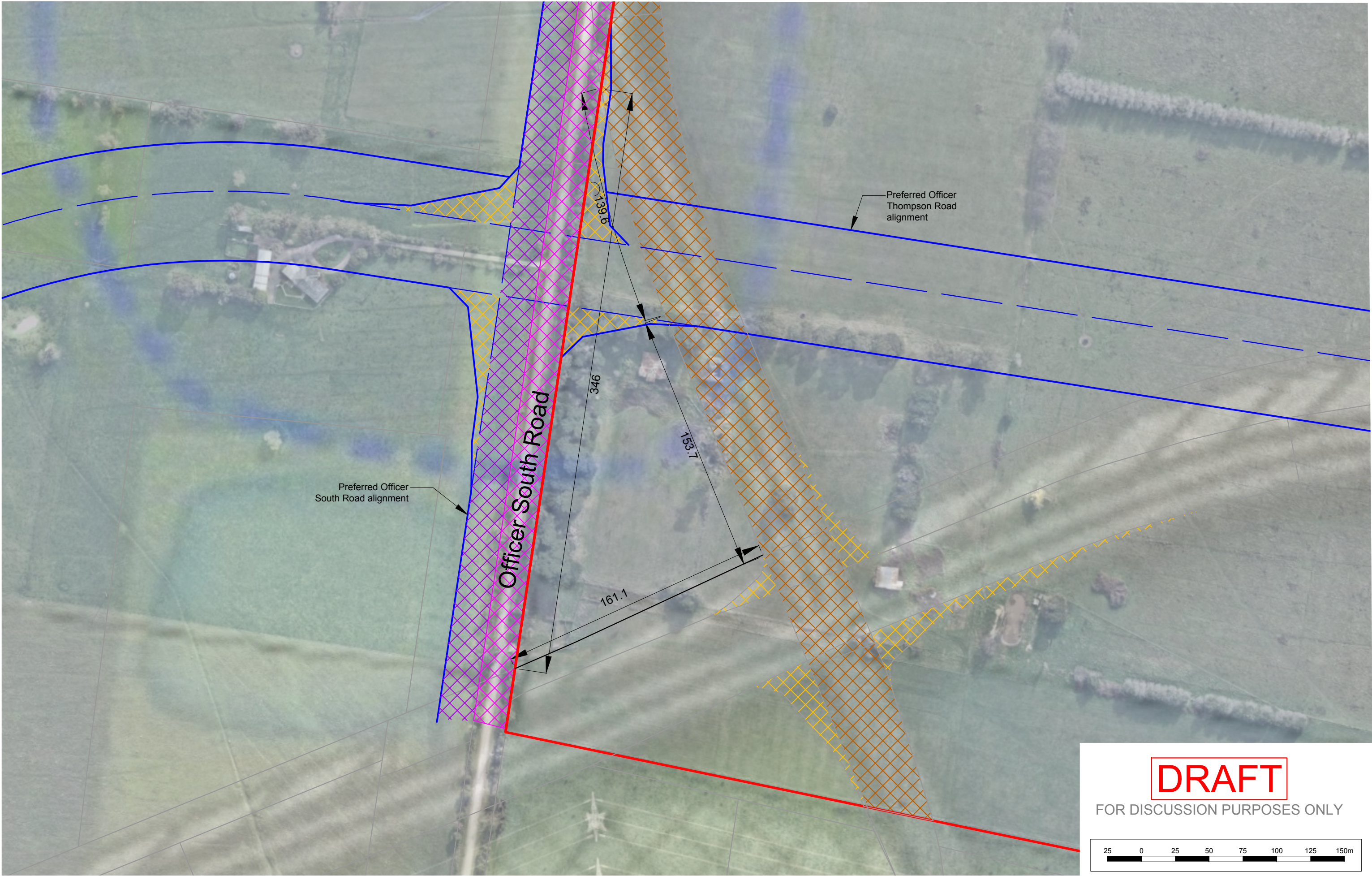


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FOR DISCUSSION PURPOSES ONLY

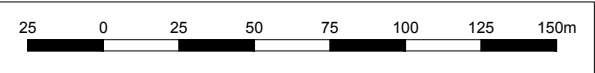






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Site Plan - PSP Amendments to Place Based Plan - Sheet 2  
345 Officer South Road, Officer South  
Abiwood Pty Ltd

01	17.10.2023	Initial Issue	MM	DRAFT	Date: 24.10.2023
02	19.10.2023	Amendments based on client comments	WEB	DRAFT	Version No: 05
03	20.10.2023	Amendments based on client comments	WEB	DRAFT	Job No: 2000079
04	23.10.2023	Amendments based on client comments	MM	DRAFT	Scale (A1): 1:1250
05	24.10.2023	Amendments based on client comments	MM	DRAFT	(A3): 1:2500
Version	Date	Description	Drafted	Approved	

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