

27 October 2023

Victorian Planning Authority
Level 25, 35 Collins Street
Melbourne VIC 3000

**RE: Officer South Employment Precinct Structure Plan
210 Officer South Road, Officer (Property 22)**

Thank you for the opportunity to make a submission in relation to Amendment C274 to the Cardinia Shire Planning Scheme and specifically the draft *Officer South Employment Precinct Structure Plan (PSP)* and accompanying planning scheme provisions.

Insight Planning Consultants, on behalf of GLG Invest (**the Client**), are acting for 210 Officer South Road, Officer (**the Site**), are pleased to provide the following submission in response to Amendment C274card (**the Amendment**).

In general terms, our clients support the progression and approval of the Officer South Employment PSP and the Amendment, however there are some concerns regarding specific matters 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 and the early delivery of state significant industrial land.

This submission relates to the 'Exhibited Documents' that are available on the Engage Victoria 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 Patch to support our response, and as such a Concept Masterplan has been included in Appendix A.

I trust the contents of this submission are clear however, we look forward to working closely with the Victorian Planning Authority (VPA) to progress the approval of the Officer South Employment PSP.

1. Subject Site

The Site is located at 210 Officer South Road in Officer and is located within the Officer South Employment Precinct (the Precinct). The Site is identified as Property 22 within the PSP, as shown below. The Site is located on the western side of Officer South Road. The Site is rectangular in shape and has a total area of approximately 10 hectares.

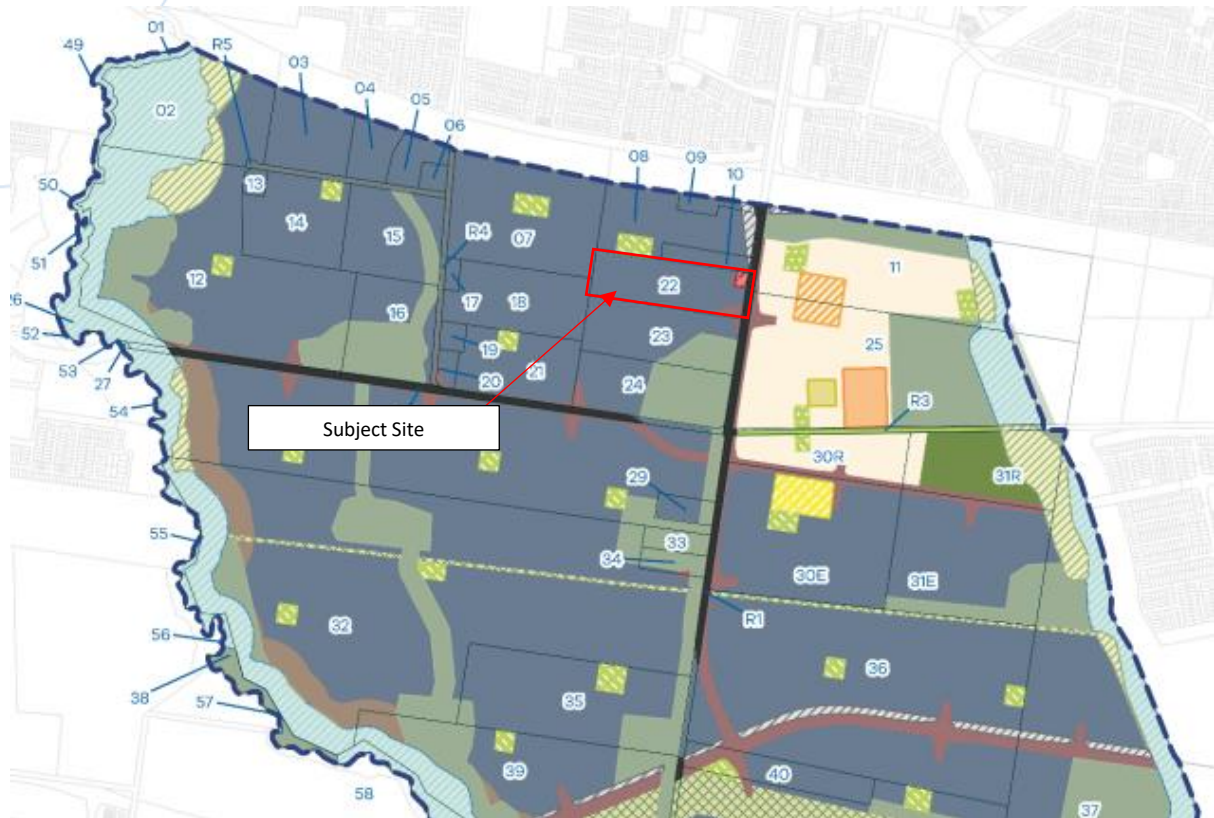


FIGURE 1: EXTRACT OF PLAN 14 – LAND USE BUDGET (OFFICER SOUTH EMPLOYMENT PSP)

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 draft PSP, that relate to the Site at 210 Officer South Road, Officer (Property 22). In supporting the PSP moving forward, our client is looking to develop the land as soon as possible. Our client has prepared a Concept Masterplan for the subdivision of Property 22, however in order to achieve their preferred development outcome, the following requested changes to the PSP need to be made. The Concept Masterplan is provided at Appendix 1 of this submission.

Plan 3 – Place Based Plan

An extract of Plan 3 – Place Based Plan, and how it relates to the Site, is shown below.



FIGURE 2: EXTRACT OF PLAN 3 – PLACE BASED PLAN (OFFICER SOUTH EMPLOYMENT PSP)

The land uses shown on the Site include:

- Business (C2Z);
- Proposed emergency services facility;
- Connector street – industrial; and
- Intersection works between the Connector street and Officer South Road.

The designation of the Site primarily for Business, with an underlying Commercial 2 Zone is supported. However, the following concerns are raised in relation to the proposed emergency services facility and the connector street:

Proposed Emergency Services Facility

The draft PSP currently identifies a proposed emergency services facility in the north-eastern corner of the Site. The location of the proposed emergency services facility on the Site is not supported. It is therefore requested that this be relocated elsewhere within the Precinct, such as on the eastern side of Officer South Road on land that is owned by Development Victoria or abutting the proposed Health Facility, which seems a logical use to co-locate with.

If the location of the proposed emergency services facility cannot be relocated, the timing for the purchase of the land for the facility needs to be clarified, with an option for the land to be developed in accordance with the underlying C2Z if the land is not purchased within the specified timeframe.

Currently there are no requirements or guidelines in the draft PSP which relate specifically to the proposed emergency services facility.

Appendix 4 – Precinct Infrastructure of the draft PSP specifies that the purchase of land and construction of the proposed emergency services facility on the Site has a timing of 'medium'. If the emergency services facility was to be relocated on the eastern side of Officer South Road onto land owned by the government,

the timing pressures to decide whether the facility is needed would be less pressing and importantly the government would not need to purchase additional land within the Precinct. However, if it was to remain on the Site, while the construction of this facility may be in the longer term, the purchase of the land by the DHHS should occur in the short term so that it does not negatively impact on the development of adjacent land within the Site.

Based on the indicative staging set out in the Concept Masterplan for the Site, land along the Officer South Road frontage could reasonably be ready to be developed within 3-5 years of PSP approval. As such, we would request that if the proposed emergency services facility cannot be relocated elsewhere in the PSP, that the timing specified in Appendix 4 be changed from medium term to short term and a new guideline be introduced into the PSP which states that if the land required for the proposed emergency service facility is not purchased within three years of the approval of the PSP, that the land may be used for alternative purposes in accordance with the PSP and consistent with the provisions of the applied zone.

Requested Changes:

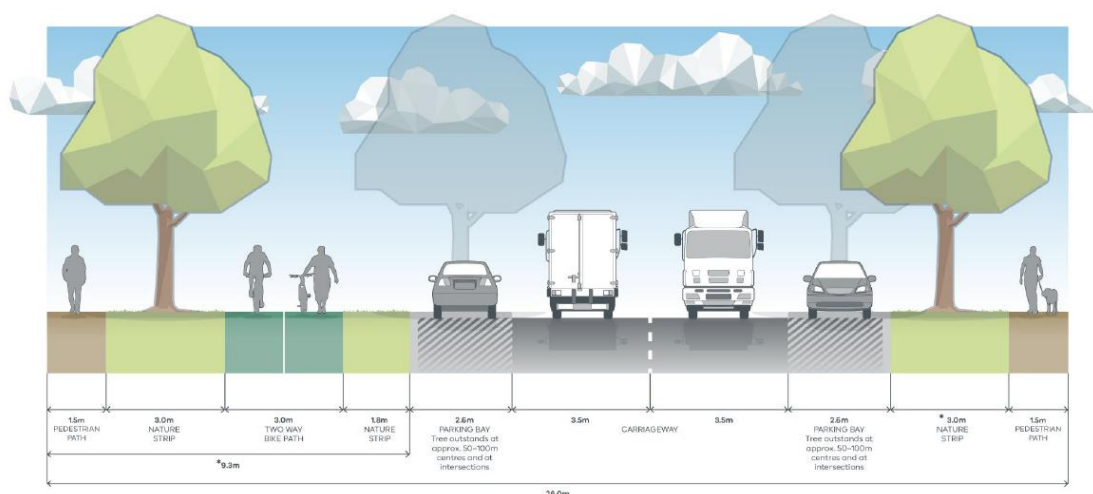
- Remove the proposed emergency services facility from the Site; or
- If the proposed emergency services facility cannot be relocated, amend the timing for this in Appendix 4 of the PSP from medium to short term, and introduce a new guideline which states, 'if the land required for the proposed emergency service facility is not purchased within three years of the approval of the PSP, the land may be used for an alternative purpose in accordance with the PSP and consistent with the provisions of the applied zone'.

Connector Street

The proposed east-west connector street is shown to be located across the Site and the adjoining property to the south (Property 23). This connector street is specified as having a total road width of 26m, in accordance with the cross section at Appendix 7 of the draft PSP, as shown below.

Connector Street – 26m – Industrial

VPA Standard Cross Section



To avoid any delivery issues in association with the construction of the connector street, it is proposed that the road pavement and the northern part of the road reserve be located on the Site, and the back of kerb for the other side of the road reserve be provided on the adjoining Property 23. This would result in a road

width of 9.3m along the northern side of Property 23, and the balance of 16.7m located along the southern side of the Site.

Additionally, adjacent to the Site, Officer South Road is shown as a 6 lane Primary Arterial Road, with the cross section at Appendix 7 of the draft PSP specifying a road width of 41 metres, as shown below. The widening of Officer South Road to the ultimate width of 41 metres is shown on the eastern side of the existing road reserve. This is supported.

Primary Arterial 6 Lane – 41m – Officer South Road with waterway interface

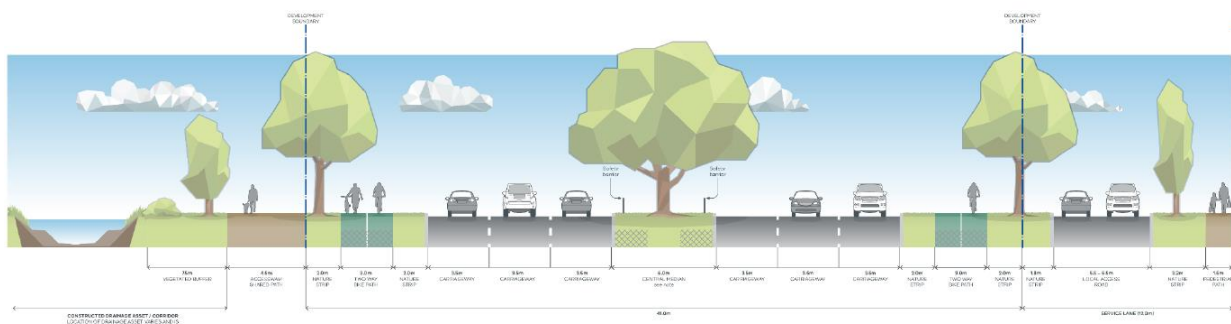


Figure 1 – Sub-precinct Concept Plan

The Site is identified within the Sub-precinct Concept Plan at Figure 1 of the draft PSP as part of the ‘Commercial Gateway Precinct’. The Commercial Gateway Precinct is further detailed as follows:

Commercial Gateway Precinct

Premium quality service and commercial frontage to Lecky Road and Officer South Road, this precinct provides a quality northern gateway, complements the residential interfaces and provides a clear transition between more intensive industries and the proposed Officer South township. It will provide small to medium lots, mid-rise density, high quality frontage to Lower Gum Scrub Creek and can accommodate **service industries, consumer electronics and business parks**, etc that benefit from arterial connections with wider communities and businesses. The inclusion of a proposed state government facility nearby the neighbourhood activity centre introduces it as a key innovation precinct suitable for **research and development** facilities such as a potential future centre of excellence.

Specifically in relation to the Site, the sub-precinct details a premium quality service and commercial frontage to Officer South Road, and more broadly the provision of small to medium sized lots, mid-rise density and accommodating service industries, consumer electronics and business parks.

Guideline 1 relates to the Sub-precinct Concept Plan and states, ‘*Employment sectors are encouraged in commercial and industrial areas at key locations and sub-precincts, as identified in Figure 1 Sub-precinct Concept Plan. Facilities such as the proposed Centre of Excellence are encouraged in commercial/mixed use*

areas where the sites have high-amenity and are well serviced with access to transport and community facilities’.

The Concept Masterplan for the Site anticipates large lots along the Officer South Road frontage, which could accommodate bulky goods retailing or homemaker centre type uses, or residential hotel and offices, with small to medium sized lots across the balance of the Site which could accommodate storage and warehousing, as well as a range of other commercial uses permitted under the C2Z.

The current wording of Guideline 1, which encourages uses that are consistent with the Sub-precinct Concept Plan, is generally supported, as long as it is ensured that alternative uses will also be considered where they are consistent with the underlying zone that applies. However, in order to further strengthen the vision of the Site, it is requested that specific wording encouraging bulky goods/homemaker centre along the Officer South Road frontage be included within the description to the ‘Commercial Gateway Precinct’ Sub-Precinct.

Requested Changes:

- Include reference to bulky goods/homemaker centre, residential hotel or offices along the Officer South Road frontage in the ‘Commercial Gateway Precinct’ Sub-Precinct Description.

Plan 11 – Precinct Infrastructure Plan

The Precinct Infrastructure Plan (PIP) at Plan 11 of the draft PSP identifies the transport and community facility project items to be funded through the Infrastructure Contributions Plan (ICP). The only ICP item currently relevant to the Site is Intersection IN-01, at the intersection of Officer South Road and the proposed connector street through the Site. The inclusion of this intersection in the ICP is supported.

Further, in Appendix 4 – Precinct Infrastructure of the draft PSP, the following items are relevant to the Site:

Category	PIP Ref No.	Title	Description	Lead agency	Component included in ICP			Timing	Apportionment Funding Scheme	Apportionment to the ICP
					Ultimate land	Interim land	Ultimate construction			
Road	IN-01	Officer South Road/East-west Connector (North)	Construction of an interim primary arterial to connector signalized 4-way intersection	Cardinia Shire Council	Yes	Yes	No	S-M	N/A	100.0%
Community Facility	N/A	Proposed emergency services facility	Purchase of land and construction of a proposed emergency services facility	Victorian Health Building Authority	No	No	No	M	N/A	-

It is requested that the proposed east-west connector street through the Site, for the extent between Officer South Road and Stephens Road, is also included as an ICP item.

The construction of a connector street is an allowable item in a supplementary levy, as specified in the *Ministerial Direction on the Preparation and Content of Infrastructure Contributions Plans* (the Ministerial Direction)(Table 5, pg 15). Specifically:

Supplementary levy allowable item	Requirements for including a supplementary levy
Local or connector roads	<p>The item must be a works, service or facility that a developer of land normally provides on or to the land in order to develop the land for urban purposes.</p> <p>The item must be constructed on, or adjoining, land in fragmented ownership and the fragmented ownership must make provision of the item by the developer difficult.</p> <p>The relevant municipal council must have agreed to be the development agency for the item.</p> <p>The estimated cost of the item must be fairly levied amongst the developers who will benefit from the delivery of the item.</p>

Additionally, the land associated with the connector street is also an allowable public purpose under the Minister Direction (Table 7, pg 17). Specifically:

Allowable Public Purpose	Permitted use or development of public purpose land
Other infrastructure that is essential to the development of the ICP plan area	Construction of other works, services or facilities (other than State Infrastructure) funded from a supplementary levy.

The early delivery of the east-west connector street between Officer South Road to the east and Stephens Road to the west is essential to the development of the precinct and would allow the development front to extend west from Officer South Road without being reliant on upgrades to Lecky Road, ahead of the anticipated staging set out in the Infrastructure and Development Staging at Plan 12 of the draft PSP. This would result in the early delivery of state-significant industrial land, consistent with the purpose and vision of the PSP, which would otherwise be reliant on the delivery of road infrastructure in Stage 3, as specified in Plan 12.

Given that the land required for the east-west connector street crosses a number of properties, which would otherwise make delivery of this road difficult, the inclusion of this connector street in the ICP as a supplementary item would allow the cost of this road to be levied against the properties that would directly benefit from its construction, as indicated below. This would subsequently allow for its early delivery, without placing an unreasonable financial burden on the Site.

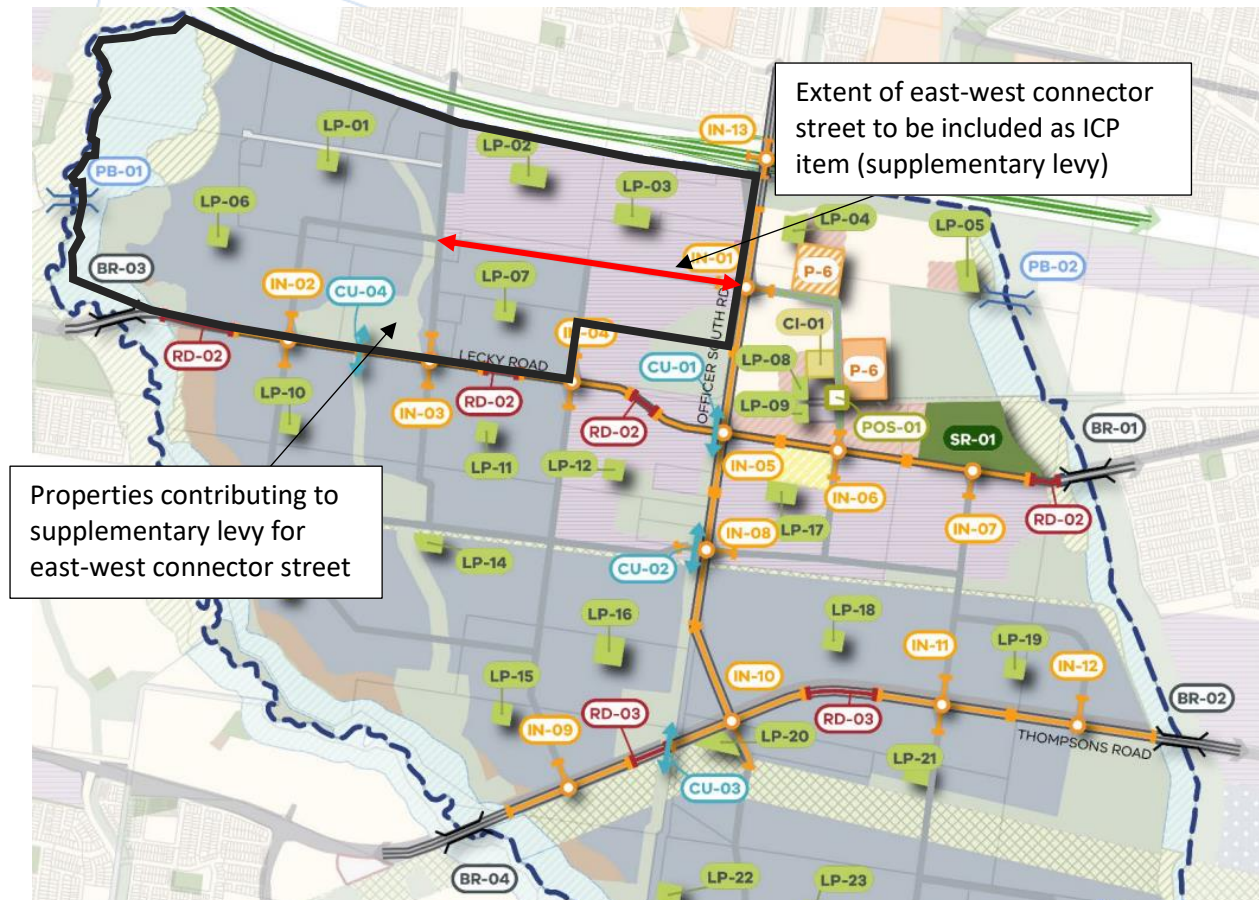


FIGURE 3: EXTRACT OF PLAN 11 - PRECINCT INFRASTRUCTURE PLAN (OFFICER SOUTH EMPLOYMENT PSP)

The inclusion of the land required for the connector street in the ICP as public purpose land would also clarify the land area required for its construction on each property it crosses, including the Site. This could further solidify our position that a road width of 9.3m should be provided along the northern side of Property 23 and a road width of 16.7m should be provided along the southern side of the Site, for the provision of the ultimate 26m wide connector street, as previously stated in our submission above.

A supplementary levy for transport projects is currently proposed under the draft ICP. The current supplementary levy has a total cost of \$76,846,764.69 apportioned to the Precinct, with a per hectare rate of \$114,316.30. The VPA's Benchmark Infrastructure Costs for 2023/2024, specify that estimated cost of a Connector Street is \$4,692,344 per 800 metres of road (P90). The extent of road required between Stephens Road and Officer South Road is approximately 1,115 metres, and as such would have a cost of approximately \$6,539,954 to be included to the supplementary levy. Further, the land required for the east-west connector street is requested to be included in the ICP as Inner Public Purpose Land (IPPL). The amount of IPPL for the connector street, which would have a road width of 26 metres, would therefore be approximately 2.89 hectares in addition to the current IPPL for transport projects of 9.15 hectares specified in the draft ICP.

Requested Change:

- Include the construction of the east-west connector street between Officer South Road and Stephens Road as an ICP item (supplementary levy).
- Include the land required for the east-west connector street between Officer South Road and Stephens Road as Inner Public Purpose Land.

These changes would also apply to the draft Officer South Employment Infrastructure Contributions Plan.

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 3 – Place Based Plan (pg 15)	<ul style="list-style-type: none"> • Remove the proposed emergency services facility from the Site; or • If the proposed emergency services facility cannot be relocated, amend the timing for this in Appendix 4 of the PSP from medium to short term, and introduce a new guideline which states, ‘if the land required for the proposed emergency service facility is not purchased within three years of the approval of the PSP, the land may be used for an alternative purpose in accordance with the PSP and consistent with the provisions of the applied zone’. 	Early purchase of the land required for the emergency services facility by the DHHS will prevent this land from sitting vacant over the longer term, which would detrimentally affect the development and viability of the rest of the land within the Site along the Officer South Road frontage.
Figure 1 – Sub-precinct Concept Plan (pg 19)	<ul style="list-style-type: none"> • Include reference to bulky goods/homemaker centre, residential hotel or offices along the Officer South Road frontage in the ‘Commercial Gateway Precinct’ Sub-Precinct Description. 	The inclusion of this wording will strengthen the ability of the Site to develop in accordance with the overall vision and Concept Masterplan for the Site.

Plan 11 – Precinct Infrastructure Plan (pg 57) Plan 12 – Infrastructure and Development Staging (pg 58) Table 7 – Precinct Infrastructure (pg 68-75) Plan 14 – Land Use Budget (pg 76) Table 8 – Summary Land Use Budget (pg 77) Table 9 – Property-specific Land Use Budget (pg 78-81)	<ul style="list-style-type: none"> • Include the construction of the east-west connector street between Officer South Road and Stephens Road as an ICP item (supplementary levy). • Include the land required for the east-west connector street between Officer South Road and Stephens Road as Inner Public Purpose Land. <p><i>These changes would also apply to the relevant plans and tables in the draft Officer South Employment Infrastructure Contributions Plan.</i></p>	Allows the development front to extend west from Officer South Road and provide for the early delivery of state significant industrial land.
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We trust the above information is sufficient for the VPA’s review of the submission. If our comments and recommendations are not supported by the VPA, given the major implications that the draft PSP could have on the deliverability of the Site and the Precinct more broadly, we will value the opportunity to discuss these further.

Finally, we reserve our right to provide additional submissions as the process continues and look forward to being involved in discussions to resolve the matters raised

Please do not hesitate to contact me on [REDACTED] if you have any queries.

Yours sincerely

Jason Black
Managing Director
Insight Planning Consultants

Appendix 1 – Concept Masterplan (Patch, May 2023)

DEVELOPMENT ANALYSIS

Parcel Area	10.000 ha
Intersection Land Take	0.490 ha
Net Developable Area (NDA)	9.510 ha
Local Roads	2.861 ha
Tree Reserve (Non-Credited OS)	0.000 ha
Net Commercial Area (NCA)	6.649 ha
Commercial Area	6.649 ha
Development Yield Estimate	
Commercial Lots	49 Dw
Average Lot Size	1357 m ²
Total Yield (inc. Industrial Lots)	49 Dw
Average Lot Area	1357 m²
Lot Density (NDA/Ha)	5.15 Dw/ha

