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27 October 2023

Victorian Planning Authority
Level 25, 35 Collins Street
Melbourne VIC 3000
Submitted through Engage Victoria website

Dear Sir / Madam

OFFICER SOUTH EMPLOYMENT PSP

SUBMISSION ON BEHALF OF THE LUMANOVSKI FAMILY

LOT 2 OFFICER SOUTH ROAD, OFFICER

Human Habitats acts on behalf of the Lumanovski family in relation to their property at Lot 2 Officer South Road, Officer ("our client's site"). We write in response to the exhibition of the Draft Officer South Employment PSP (September 2023) ("the PSP") and the Draft Melbourne Water Drainage Strategy ("the DSS"). The PSP identifies our client's land for 'business' purposes and includes a large drainage area on the east half of the site.

On behalf of our client, we wish to make the following submission:

1. The drainage area proposed is oversized and should be reduced.
2. The drainage area is not equitably located and unreasonably burdens our client's site.

Our justification and reasons for making this submission is outlined in the remainder of this correspondence.

1 Background

The site is located at the corner of Officer South Road and Lecky Road. The site has an approximate area of 12.2 hectares and is currently vacant. It has an approximate 200 metre frontage to Officer South Road and a 570 metre frontage to Lecky Road.

There are several trees and groups of vegetation across the site. The tree rows appear to be planted as part of the agricultural use of the land.

The site is located within the Urban Growth Zone and along its Officer South Road frontage is affected by the Land Subject to Inundation Overlay.



Figure 1 - Aerial view of subject site (highlighted in blue)



3 Submission

On behalf of our client, we wish to raise issue with the proposed location and extent of the proposed drainage area on Lot 2 Officer South Road, Officer. The proposed drainage area is oversized and unreasonably burdens our client's land.

Arcadis has undertaken a review of the draft DSS and the assessment/modelling that underpins it and finds:

Modelling

- There is an opportunity to optimise the MUSIC model and reduce the size of the wetland through revising the conservative impervious fraction and initial storage assumptions for the catchment.
- The wetland is achieving water quality targets well above best practice requirements. The wetland size can be optimised further (area reduced by 24%) and still achieve the water quality requirements.
- Through review of the RORB modelling it was found that the retarding basin is oversized for the catchment it serves by approximately 50% based on peak flow rates.

Location

- Whilst it is acknowledged our client's land is the low point of the catchment, the loss of developable land is not shared equally. The wetland should be reconfigured to be shared across both our client's site and the property to the north (220 Officer South Road, Officer).
- Should the wetland be reduced in size, this reduction in area could be shared between both properties.
- The realignment of Lecky Road creates a parcel of land to the south of the site which could also be incorporated into the reserve area. This would provide a functional use of constrained land, share the loss of developable land with another land owner and provide access to the reserve area from Lecky Road.

Drainage Scheme Options

- Option 1B included a combined wetland and retention basin reserve area of 7.81 hectares but was unreasonably dismissed as it was deemed to not satisfy the predeveloped flow criteria at Patterson Road.
- Patterson Road is a long way downstream and there are several factors that can contribute to Option 1B not achieving the predeveloped flow targets at Patterson Road. It is also noted that the preferred Option 1F also does not meet all predeveloped flow targets.
- A reduction in the size of the reserve area has not been given sufficient consideration and needs to be investigated further.

It is also noted that according to Melbourne Water's Principles for Creating Development Service Schemes, infrastructure should be optimal in terms of cost and performance. From this initial review, the proposed reserve fails in both aspects as it is excessively large from a water quality and on-site detention perspective.

Based on the above, our client's land is proposed to be unreasonably encumbered. There are several options available to reduce the drainage area proposed and distribute it more equitably across adjoining properties. Please refer to the enclosed Memorandum of Advice prepared by Arcadis dated 25 October 2023 for further information.



4 Conclusion

Human Habitats acts on behalf of the Lumanovski family in relation to their property at Lot 2 Officer South Road, Officer. Upon review of the draft Officer South Employment PSP and draft DSS prepared by Melbourne Water, we have concern with the size and location of the proposed drainage area. We believe our client's land is proposed to be unreasonably encumbered and its development potential unnecessarily reduced.

Our client looks forward to engaging in discussions with the VPA in the hope of agreeing a position on the strategic planning for the site. Notwithstanding, our client reserves the right to make further submissions to the draft PSP and DSS in due course, including appearing at a Standing Advisory Committee hearing.

If you would like to discuss this submission further, please do not hesitate to contact the undersigned at

[Redacted contact information]

Yours sincerely

Robert Williams
Associate