

27 October 2023

Nino Polon
Manager South-East Region
Melbourne Water
990 La Trobe Street
Docklands VIC 3008

**RE: Officer South Draft Drainage Strategy
Lot 1, Officer South Road, Officer South**

Thank you for the opportunity to make a submission in relation to the *Officer South Draft Drainage Strategy* (the **Strategy**). Melbourne Water is preparing the Draft Drainage Strategy, which includes a Development Services Scheme (**DSS**), to support the Victorian Planning Authority's Officer South Employment Precinct Structure Plan (**PSP**), which is also currently on exhibition.

Insight Planning Consultants, on behalf of the Tuck Family, are acting for Lot 1, TP370056, known as Officer South Road, Officer South (the **Site**), and are pleased to provide the following submission in response to the DSS.

In general terms, our clients support the progression of the Strategy, however have major concerns regarding specific matters that are outlined in this submission that we seek to be addressed.

This submission relates to the DSS and supporting documents that are available on Melbourne Water's 'yoursay' website and seeks to outline key issues that we believe will enhance the deliverability of the Precinct, particularly in so far as it relates to the Site.

I trust the contents of this submission are clear however, we look forward to working closely with the Melbourne Water to progress the approval of the DSS.

1. Subject Site

The Site is located at Officer South Road (Lot 1, TP370056) in Officer South and is located within the Officer South Employment Precinct (the **Precinct**). The Site is located on the western side of Officer South Road, is irregular in shape and has a total area of approximately 18.32 hectares. An aerial of the Site is shown below.



FIGURE 1: AERIAL OF SITE (LANDCHECKER)

2. Submission

Our clients do not support the DSS or the draft PSP in its current form as it delivers an unacceptable outcome for their land, which will make its development highly unlikely in the future and thus restrict the ability for the Government to achieve the desired environmental, drainage and road access outcomes on the land.

Key Issues

There are a number of key issues that we have identified in the Strategy that relate to the Site at Officer South Road. In supporting the Strategy moving forward, our client is looking to improve the developability of the Site and broader Precinct.

Drainage Reserves

The DSS Asset Overview Plan shows a watercourse along the eastern boundary of the Site, with a proposed retarding basin in the southern corner of the Site. An extract of this plan is shown below.

the Officer South Employment PSP. More specifically, this area is considered to have biodiversity values of both national and state significance for the Growling Grass Frog, Australian Grayling and Dwarf Galaxias. The waterway conservation area identified in the draft PSP is consistent with the BCS Conservation Area 36.

A concept plan for the conversation area is shown at Figure 6 – Conservation Concept (Cardinia Creek) Part 3 of the draft PSP, an extract of which is shown below.

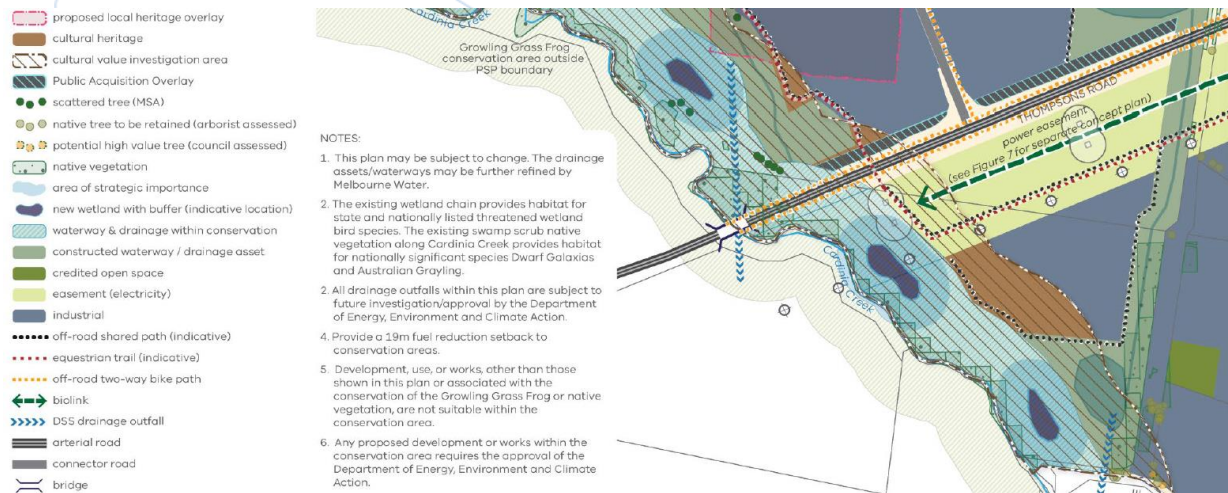


FIGURE 3: EXTRACT OF FIGURE 6 - CONSERVATION CONCEPT (OFFICER SOUTH EMPLOYMENT PSP)

The DSS Asset Overview Plan shows a number of new wetlands within the conservation area along Cardinia Creek which will provide enhanced Growling Grass Frog habitat, consistent with those shown in the Conservation Area Concept Plan above.

The BCS specifies that *'land within Conservation Areas classified as Growling Grass Frog conservation... may be secured through voluntary transfer of the land to the appropriate public authority identified by DEPI. The option of a transfer of land for a reduction in habitat compensation obligation is not available in these areas'* and that land purchase of these conservation areas is not an option (pg 15). If the Site is unable to be developed (ie for industrial purposes), there is no opportunity to vest the land to the relevant authority as part of a Planning Permit for the Site. As such, the proposed works within the conservation area will not be able to be completed.

Waterway Reserve

In accordance with the draft PSP, Officer South Road is proposed to be realigned south of Thompsons Road. While it is currently uncertain as to whether the existing road reserve will continue to act as a local access road for the properties adjacent to it, if the road reserve was no longer needed it is requested that the waterway be shifted into the existing road reserve. This would reduce the amount of land on the Site that is encumbered for drainage purposes, and therefore increase the amount of developable industrial land.

Requested Change:

- Relocate waterway into the existing Officer South Road reserve if it is no longer needed, due to the realignment of Officer South Road south of the Thompsons Road extension.

We trust the above information is sufficient for Melbourne Water's review of the submission.

Given the limited time available for the lodgment of this submission, it is requested that additional time be provided to allow a more detailed review of the DSS documentation and further drainage investigation and modelling work to occur, ahead of ongoing discussions with Melbourne Water with regard to the requested changes.

Given the major implications that the DSS could have on the deliverability of the Site, 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