

27 October 2023

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

**RE: Officer South Employment Precinct Structure Plan  
135 Stephens Road & 330 Lecky Road, Officer (Properties 18 & 21)**

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 Officer Land Co Pty Ltd (**client**), are acting for 135 Stephens Road (Property 18) and 330 Lecky Road (Property 21) in Officer, and 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.

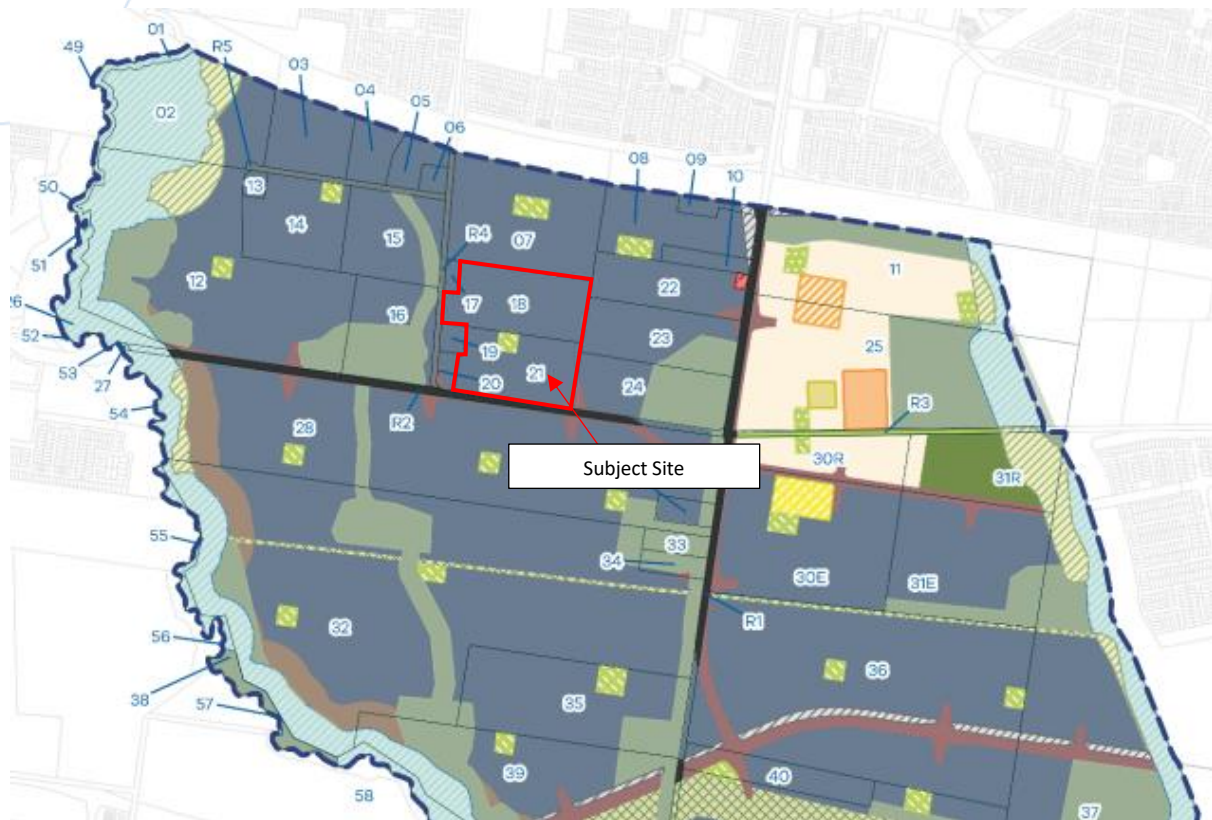
This submission relates to the 'Exhibited Documents' that are available on the Engage Victoria website and seeks to outline each issue of concern and a requested change that we believe will enhance the deliverability of the PSP.

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 SMEC to support our response, and as such a Concept Plan has been included in Appendix 1.

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 consists of two contiguous land parcels at 135 Stephens Road and 330 Lecky Road in Officer, which are identified as Properties 18 and 21 respectively within the PSP, as shown below (together, the **Site**). The Site is located on the northern side of Lecky Road within the Officer South Employment Precinct (the **Precinct**). 135 Stephens Road has an area of approximately 12.15 hectares, while 330 Lecky Road has an area of approximately 10.92 hectares, with a combined total area of 23.07 hectares. The Site is currently serviceable by existing drainage and sewerage infrastructure within the northern part of the Precinct, as demonstrated by an initial servicing strategy review that SMEC has undertaken for the client.



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

## 2. Submission

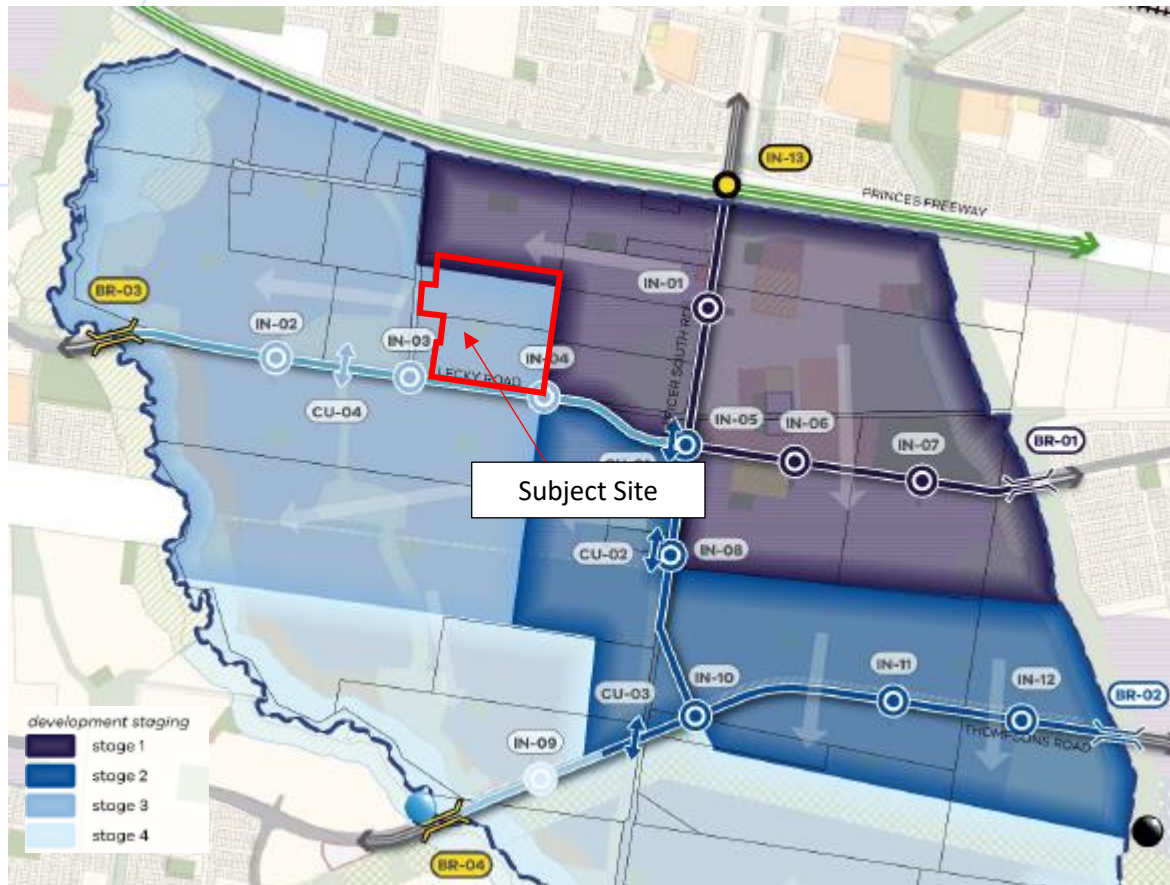
The following submission is provided to assist in ensuring the deliverability of the Site and provision of state significant industrial land within the Site and broader Precinct, and allowing development on the Site to commence as soon as practical.

### 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 (Properties 18 & 21). In supporting the PSP moving forward, our client is looking to develop the land as soon as possible. Our client has provided a Concept Plan prepared by SMEC for the Site, however in order to achieve their preferred development outcome, the following requested changes to the PSP need to be made. The Concept Plan is provided at Appendix 1 of this submission.

### Precinct Staging

The key issue with the draft PSP is the proposed staging of development and infrastructure within the Precinct. An extract of Plan 12 – Infrastructure and Development Staging of the draft PSP is shown below.



**FIGURE 2: EXTRACT OF PLAN 12 - INFRASTRUCTURE & DEVELOPMENT STAGING (OFFICER SOUTH EMPLOYMENT PSP)**

As shown in the plan above, some of the Site, including the land required for the east-west connector street is currently in Stage 1, while the balance of the Site to the south of the east-west connector street is in Stage 3.

Given that part of the Site, including the connector street, is already in Stage 1 it is considered appropriate that at a minimum the balance of the Site is also included in Stage 1 as a 'logical inclusion', to allow development of the Site in its entirety to occur simultaneously. Squaring up the Stage 1 boundary to Stephens Road to the west and Lecky Road to the south should also be considered, as this would result in a more logical planning outcome. This would allow some state significant industrial land to be delivered in Stage 1 of the Precinct, in accordance with the primary role and purpose of the PSP and the direction of overarching strategic policies to provide industrial and employment land within the Precinct.

SMEC has undertaken an initial servicing strategy review for the client which has confirmed that there are no major limitations to the Site developing in Stage 1 of the Precinct and is able to connect into servicing infrastructure (drainage, sewer, road and electricity) currently identified within Stage 1. In particular, the Site is able to connect to the existing sewer pump station in the north of the Precinct.

Further, the additional traffic volumes anticipated to be generated by the industrial land within the Site if it were to be included in Stage 1 would be relatively minor and unlikely to exceed the road capacity of transport infrastructure in Stage 1. It is anticipated that the industrial land within the Site

will largely utilise the connector street to get back onto Officer South Road and then onto the freeway, given that industrial traffic is generally discouraged from passing through residential land within this or surrounding PSPs or established residential areas due to the issues arising from traffic conflict and congestion. Therefore, to sterilise the development of the Site by requiring the delivery of infrastructure, which will connect the Precinct to areas where industrial traffic is unlikely to go, is counterintuitive.

As such, it is requested that the entirety of the Site be located within Stage 1 of the Precinct.

**Requested Changes:**

- Include the entirety of the Site (Properties 18 & 21) within Stage 1.

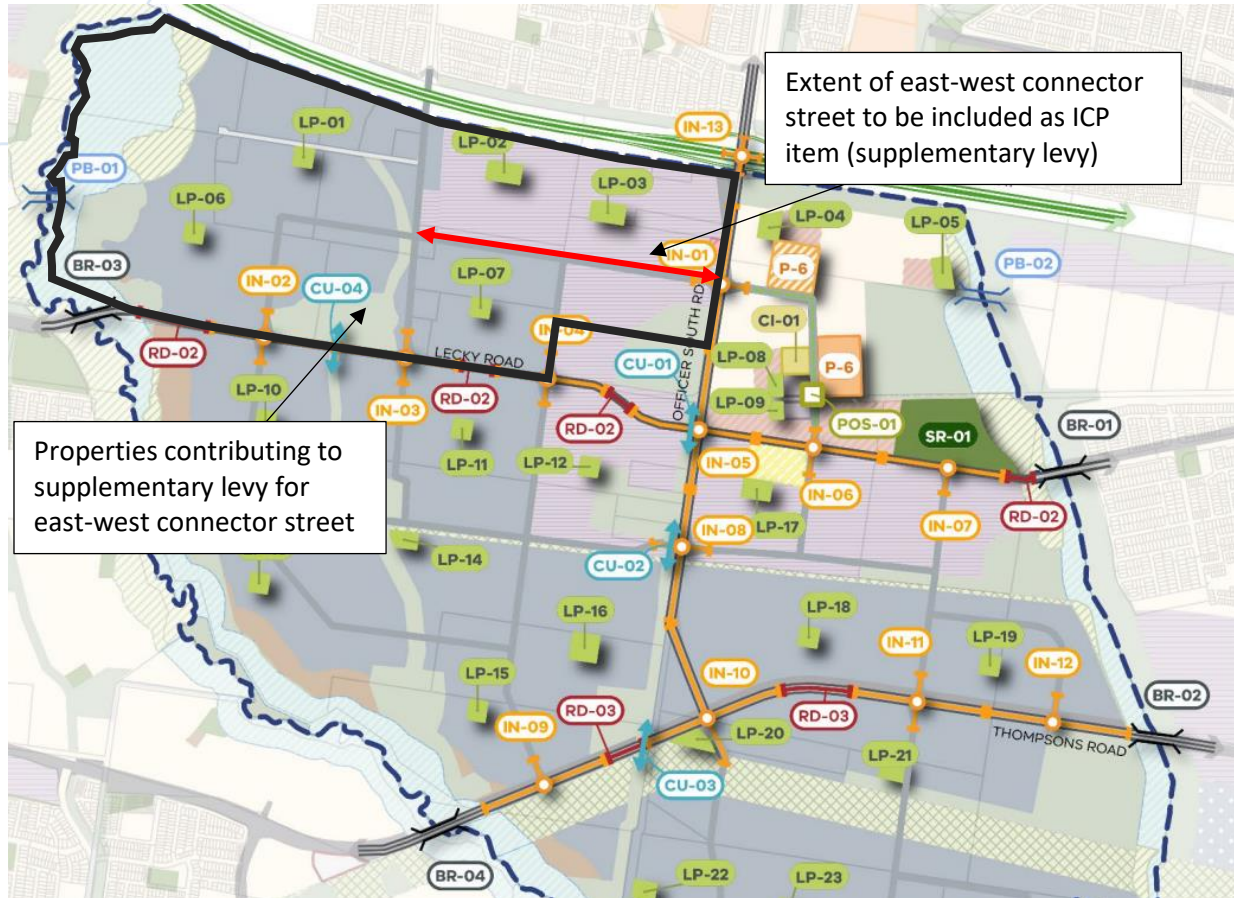
**Connector Street**

The east-west connector street between Officer South Road and Stephens Road is integral for the development of the Precinct and connection of fragmented land parcels and should be included as an ICP item within the supplementary levy. Without it, land identified as Stage 1 will not be readily developable. This connector street should be identified in Plan 12 as being a Stage 1 infrastructure item, as land within Stage 1 west of Officer South Road cannot develop without it. Without the delivery of this connector street, all properties within Stage 1 west of Officer South Road cannot develop, due to limited access opportunities to Officer South Road as a result of the proposed PAO for the freeway interchange works and the proposed waterway reserve. This impacts the deliverability of the entire Precinct and the current road access arrangements proposed.

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 in the plan below. We have already had preliminary positive discussions with several of the landowners in this part of the Precinct in support of the inclusion of the connector street as an ICP item. This would subsequently allow for its early delivery as works in kind. The ICP only works if the landowners with the connector street located within their land



holdings are all in the same Stage (i.e. Stage 1) to ensure funding is secured.

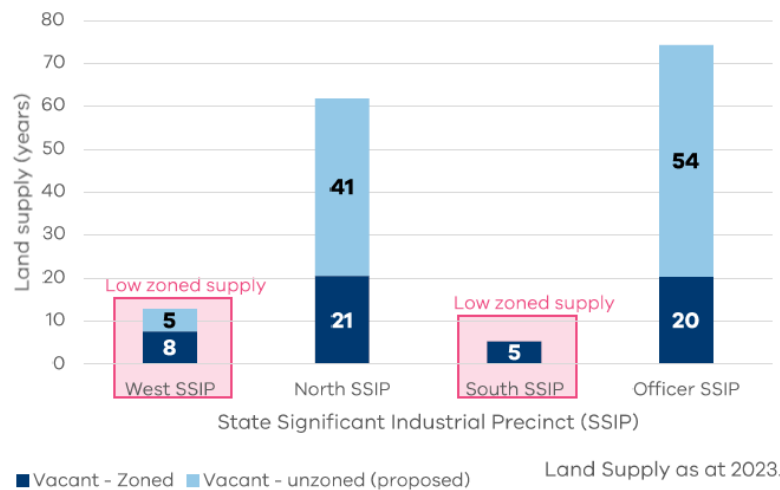


**FIGURE 3: EXTRACT OF PLAN 11 - PRECINCT INFRASTRUCTURE PLAN (OFFICER SOUTH EMPLOYMENT PSP)**

Together with the requested inclusion of the Site in Stage 1, the addition of the east-west connector street between Officer South Road and Stephens Road as an ICP item would allow the development front to extend west from Officer South Road and provide for the early delivery of some state significant industrial land, consistent with the purpose and vision of the PSP. Additionally, the delivery of the connector street would alleviate the pressure for upgrades to Lecky Road, which are likely to be significantly more complex given it needs to be created and realigned. By allowing the connector street to be developed by parties that are ready to develop in Stage 1, the Precinct can start delivering much needed industrial land in a region where supply is diminished, as indicated in the below figure from the July 2023 VPA Update.

Industrial land is in high demand – and is being consumed at a high rate, contributing to price escalation and land supply shortages.

#### Industrial land supply, State Significant Industrial Precincts, 2023



Source : Industrial land data, Urban Development Program, DTP, December 2021

**FIGURE 4: GROWTH CONTEXT FIGURE - INDUSTRIAL AND EMPLOYMENT LAND (VPA UPDATE, JULY 2023)**

#### Requested Changes:

- 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.
- Identify the east-west connector street between Officer South Road and Stephens Road as a Stage 1 infrastructure item.

*These changes would also apply to the relevant plans and tables in 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.

Page/Plan/Reference	Requested Change	Rationale
<b>Key Issues</b>		
Plan 12 – Infrastructure and Development Staging (pg 58)	<ul style="list-style-type: none"> <li>Include the entirety of the Site (Properties 18 &amp; 21) within Stage 1.</li> </ul>	Provides for the delivery of state significant industrial land in the first Stage of the Precinct, consistent with State and regional planning policy and the primary purpose of the PSP.
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"> <li>Include the construction of the east-west connector street between Officer South Road and Stephens Road as an ICP item (supplementary levy).</li> <li>Include the land required for the east-west connector street between Officer South Road and Stephens Road as Inner Public Purpose Land.</li> <li>Identify the east-west connector street between Officer South Road and Stephens Road as a Stage 1 infrastructure item.</li> </ul> <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.

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 Plan (SMEC, Oct 2023)



Land Budget for Total Site	Concept Plan		
	Area (ha)	% of Site	% of NDA
Total Site Area	23.06	100%	
Transport			
Road Widening	0.01	0%	
Open Space Network			
Credited Open Space	0.50	2%	
Local Network Parks	0.50	2%	
Total	0.51	2%	

	Area (ha)	% of Site	% of NDA
Total Net Developable Area (NDA)	22.56	98%	100%
Retail and Commercial	20.30	88%	90%
Industrial Sites	20.30	88%	90%
Roads	2.25	10%	10%
Connector Roads	2.25	10%	10%
Total Net Residential Area (NRA)	2.25	10%	10%



Legend

- Site boundary
- Connector road
- Road widening
- Industrial
- Local Park
- Contours (1m)

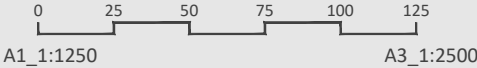
Notes

- All cadastral and contour information is derived through VICMAP;
- Aerial photographs are used under license from Metromap;
- Further investigations may be needed and may not have been captured in this plan including, but not limited to: Feature Survey, Flora and Fauna, Arboricultural Survey, Archaeological, Engineering Services, Hydrological Engineering, Traffic Engineering;
- For the purposes of this plan it has been assumed that a permit can be obtained for the removal of remnant vegetation and scattered trees on the site. Should further information become available, the land budget may be affected;
- Staging of works and access to infrastructure may also influence the design and may not have been captured in this plan;
- This is an area based yield analysis and has been created for the purposes of an indicative feasibility study.
- Access points, intersection layouts and other traffic related assumptions are subject to detailed design and approval from the relevant authorities;
- The layout and land uses for the site and surrounds (including any open space obligations) are subject to the future Officer South Precinct Structure Plan, and relevant authority requirements.
- The yield and dwelling densities quoted are simulated. For further yield accuracy, a computed subdivision plan will be necessary;
- This plan has been prepared for discussion purposes only.

Feasibility Concept Plan

135 Stephens Road and 330 Lecky Road, Officer

Date Issued: 25/10/2023 | Revision: C\_2  
SMEC Project Reference: 1045934.14 | Drawing: 01.01  
Drawn by: H. van Rijnberk | Checked by: N. Hollow



DRAFT

Urban Communities

