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3 November 2023

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Via email: sarah.doring@vpa.vic.gov.au

Dear Justin,

**PUBLIC CONSULTATION, OFFICER SOUTH EMPLOYMENT PRECINCT  
STRUCTURE PLAN (PSP)**

Thank you for your letter of 25 September 2023 advising of the commencement of public consultation.

Melbourne Water is supportive of working with the VPA and other government agencies in delivery of the "whole of government" approach in the planning for new greenfield precincts, including Officer South Employment PSP.

We have undertaken a detailed review of the draft documentation (refer to attachment 1, submissions log) and have identified the following key issues:

**1. Infrastructure and development staging – PSP Plan 12**

As you are aware, coordinating the staging of development in line with infrastructure delivery is crucial to provide for future communities. While the exhibited *Infrastructure and development staging plan* identifies staging and key drainage outfall locations, there is no proposed mechanism to ensure all drainage assets are delivered according to the staging plan.

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This issue has been acknowledged for critical road infrastructure, with the proposed use of a Specific Controls Overlay (SCO).

Given the current drainage and flood conditions of this precinct and areas to the south within the Koo Wee Rup Flood District, high risk of sodic soils, shallow groundwater and sensitive environmental interfaces, staging of infrastructure delivery is fundamental.

Melbourne Water requests clarification of the staging plan to address key drainage infrastructure requirements as the proposed development staging is not in accordance with logical drainage infrastructure provision for most of the PSP.

If the proposed development staging plan is to be adopted, the following needs be included/addressed in the PSP:

- increased information outlining differences in staging between the drainage infrastructure and development, including reinforcement of requirement 67 (table 3.7)
- identification of trigger points for the provision of critical drainage and flood mitigation infrastructure
- delivery mechanisms.

To address the above issues, Melbourne Water recommends the creation of a separate drainage infrastructure staging plan based on the Melbourne Water drainage staging plan (31 August 2023) and includes reference to requirement 67 in Table 3.7 - Infrastructure coordination.

As previously communicated to the VPA, Melbourne Water is not able to support development prior to the delivery of the ultimate critical drainage assets or equivalent due to the risks highlighted above.

## **2. Place Based Plan 3 – Risks locating Melbourne Water assets within Cultural heritage investigation areas**

Melbourne Water identifies significant risks associated with locating critical drainage and flood mitigation infrastructure within areas identified for cultural heritage investigation in the absence of clear guidance from the VPA and Bunurong LCAC.

Melbourne Water has requested a meeting with Bunurong LCAC to commence engagement and awaits meeting confirmation. We understand the VPA will be meeting with Bunurong LCAC to understand their objectives for this land.

In the absence of this engagement, there is an unacceptable risk that the proposed location of assets and construction footprint will conflict with areas of cultural heritage significance, and that consent will not be provided.

Melbourne Water can provide a range of examples where this has occurred, resulting in significant delays and substantial cost increases to the development industry in delivering the drainage assets.

Melbourne Water seeks a formal VPA position on how it intends to manage the absence of approvals from Bunurong LCAC to works within the cultural heritage investigation area and the associated development yield, asset delivery and financial risks.

### **3. Gas main crossings**

Melbourne Water's drainage strategy proposes to cross the T1 gas main at numerous locations to facilitate drainage for development. APA has not provided formal support for these crossings, however Melbourne Water has been consulting them regarding our proposed drainage design.

It is our understanding that APA did not lodge a formal submission to the VPA in relation to the PSP. As such, Melbourne Water will be seeking in principle approval from APA for our drainage strategy. If approval is not given, a lowering of the gas main may be required to facilitate development, the cost of which will not be funded by the Development Services Scheme.

Melbourne Water is not able to support development requiring drainage works across the T1 gas main, prior to the certainty of delivery of the ultimate assets across the main due to the risks highlighted above.

Melbourne Water seeks a formal VPA position on how it intends to manage the absence of approvals from APA to infrastructure crossings of the gas main and the associated development timing, asset delivery and financial risks.

Should you have any questions regarding this project, please contact Andrea Carr, Manager Strategic Planning on [REDACTED]  
[REDACTED]

Yours sincerely



**David Reginato**

Senior Manager, Strategic Engineering & Planning Services