

1 September 2025



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4083473

C/ Aaron Shrimpton  
Harwood Andrews

Victorian Planning Authority  
Department of Transport and Planning  
35 Collins Street  
Melbourne VIC 3000

Dear Mr Shrimpton

**Submission on behalf of D'Alberto Egg Farm  
Planning Scheme Amendment 295case - Casey Fields South (Employment) and Devon Meadows PSP  
Land: 125 and 135 Devon Road, Devon Meadows**

We act for 125 Devon Road Pty Ltd ATF The 125 Devon Road Trust and 135 Devon Road Pty Ltd ATF The 135 Devon Road Trust (**D'Alberto Farm**), being the owners of 125 Devon Road and 135 Devon Road, Devon Meadows respectively (**Land**).

The Land is identified as parcels DM-77, DM-81 and DM-82 in the Casey Fields South (Employment) and Devon Meadows Precinct Structure Plan (**PSP**). D'Alberto Farm currently owns and operates an egg farm and other horticultural operations on the Land.

Plans 6 and 9 in the exhibited PSP illustrate the extent of the impact of the proposed drainage scheme (including waterways, drainage and retarding basins, as well as DSS investigation areas) on the Land. In addition, draft Amendment C295case also proposes to apply Public Acquisition Overlay – Schedule 4 (**PAO4**) to part of the Land. It is understood the rationale for PAO4 is to facilitate a waterway diversion channel to divert significant drainage flows and protect existing downstream homes in Devon Meadows from flooding and excessive increases in volumetric discharge.

This submission seeks a revision of the proposed drainage scheme to more appropriately achieve the drainage objectives of the PSP without causing undue disadvantage to D'Alberto Farm.

As currently configured, the drainage scheme requires excessive land take for the provision of waterways, retarding basins and wetlands. This imposes an unreasonable and disproportionate burden on the D'Alberto Farm Land in particular. Our client acknowledges the need for effective flood and drainage management in the precinct, however, it is submitted that the proposed design jeopardises D'Alberto Farm's ability to efficiently use the Land and the PSP should reasonably consider a site-specific response in this area. It is suggested that additional modelling and design work should be undertaken to produce a more equitable drainage solution and more efficient land take in this part of the precinct.

Moreover, it is submitted that the application of PAO4 is premature and requires further investigation to accurately confirm the extent of land required to facilitate the current drainage scheme proposal. Until this further work is undertaken, D'Alberto Farm considers the diversion channel to be an excessive and expensive solution that is not properly justified. Accordingly, it opposes the application of PAO4 and the diversion waterway on the Land.

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D'Alberto Farm submits that the PSP should not proceed in its current form. There are reasonable and practical alternative drainage solutions which should be employed to more equitably balance the interests of landowners and efficient land take considerations, while still effectively managing drainage issues under both interim and ultimate conditions.

Please contact me on [REDACTED] if you have any queries in relation to this matter.

Yours faithfully



Partner  
Norton Rose Fulbright Australia

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Mr Eade, Standing Advisory Committee Chair, Planning Panels Victoria: [planning.panels@transport.vic.gov.au](mailto:planning.panels@transport.vic.gov.au)