

11 November 2019

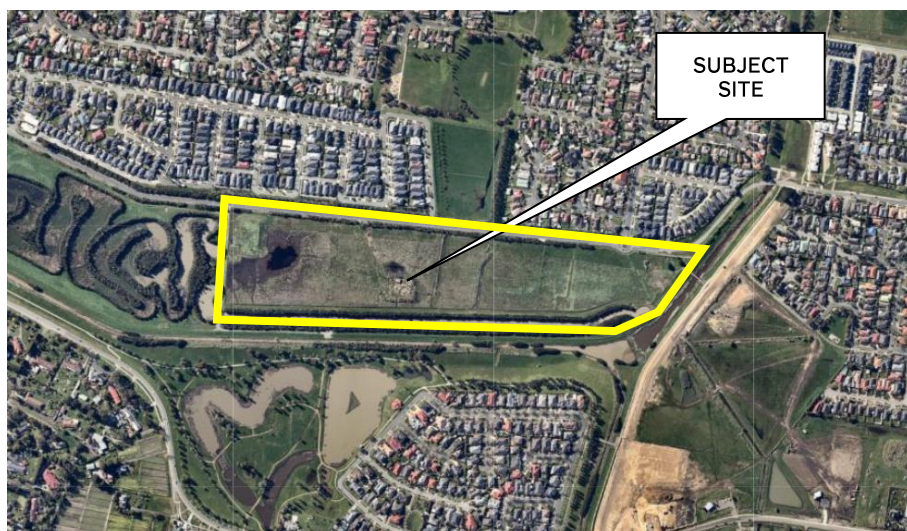
Submission to Amendment C258

We act on behalf of Reech Pty Ltd, the owner of No. 193 Golf Links Road, Narre Warren. We provide the following written submission to the exhibition of Amendment C258 'Activity Centres Strategy'.

We note that a planning permit application (PInA00154/17) and Development Plan in response to DPO11 have been submitted in relation to the subject site. The matter is currently before the Tribunal (VCAT proceedings P1065/2019 and P1066/2019) and we are in the midst of pre-hearing negotiations with Council.

Figure 1

Subject site and surrounds

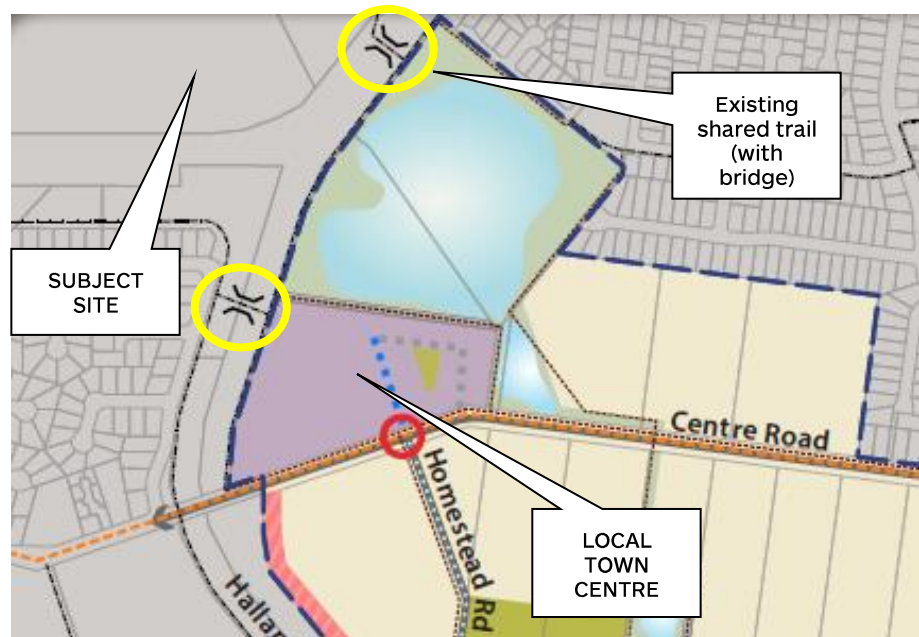


Whilst we are generally supportive of Amendment C258, we consider that Clause 21.24 should be updated as recommended by the Panel for Amendment C198.

The Panel recommended updating the Narre Warren Local Area Map at Clause 21.24-5 to show the part of 193 Golf Links Road, Narre Warren located within the General Residential Zone – Schedule 1 as a residential area. The Panel also recommended that a notation be included on the Local Area Map designating the same area of the site as a Medium Density Housing site. This is supported by the site's proximity to the Neighbourhood Centre / local town centre within the Berwick Waterways Precinct Structure Plan (PSP), which is within 400m and therefore within walking distance. This link is achieved through existing bridges over the Hallam main drain and Berwick town drain.

Figure 2

Excerpt of Berwick Waters PSP



In addition to the above, we note that the Strategic Framework Plan at Clause 21.02-6 of the exhibited documents does not show or identify the Berwick Waterways future neighbourhood centre. As such, this should be updated to correctly reflect the future Neighbourhood Centre.

We also note that Clause 21.10 'Berwick Southern Area' has not been updated to reference the approval of the Berwick Waterways PSP or indicate the activity centre which was included as part of Amendment C188 and gazetted on 20 November 2014. Rather, the map of Clause 21.10-5 includes a note related to the Berwick Waterways PSP area as "Prepare a Precinct Structure Plan for Berwick Waterways".

In summary, we agree with the panel recommendations of Amendment C198 relating to the subject site which seek to update the Local Area Map of Clause 21.24 to identify part of the site is a residential area and a

Medium Density Housing site. We further consider that Clauses 21.02 and 21.10 should be updated to reference the approval of the Berwick Waterways PSP and to indicate the future neighbourhood activity centre. We submit that these suggestions be included and form part of Amendment C258.

Should you wish to discuss further, please contact the undersigned on

[REDACTED]

Yours sincerely

[REDACTED]

**Senior Associate
ratio:**

12 NOVEMBER 2019

[REDACTED]

Dear Sir/Madam,

Town Planning Scheme Amendment C258 of the Casey Planning Scheme

Your Reference: PSA00001/19.A

Our Reference: Case Number 34927826 File 19PD9066

I refer to your letter received on 18 October 2019. South East Water as the Water Supply and Sewerage Authority has no objection to the proposed amendment C258 of the Casey Planning Scheme.

THE FOLLOWING IS OFFERED FOR INFORMATION ONLY:

Please note: As we have no objection to the Scheme Amendment, we request that both your Council and Planning Panels Victoria do not provide any further correspondence to us regarding the Amendment.

If you have any enquires please contact [REDACTED]

[REDACTED]

Team Leader Land Development

Submission 3

From: [Casey Conversations](#)
To: [REDACTED]
Subject: JohnFourOaksWard completed Send your Submission
Date: Saturday, 16 November 2019 9:01:38 AM

JohnFourOaksWard just submitted the survey 'Send your Submission' with the responses below.

Step 1. Please provide your full name.

John Glazebrook

Step 2. Please provide a valid email address.

[REDACTED]

Step 3. Please provide your phone number.

[REDACTED]

Step 4. Please provide your postal address.

[REDACTED]

Step 5. Please type your submission here or go to Step 6 to upload your submission from your own files.

Casey council's Draft Activity Centres Strategy/ C258. Casey council states that its Activity Centre Strategy Amendment C258 is an update from its 2006 and 2012 strategies and that it is essential to increase local jobs, with higher wages to be achieved by promoting economic growth within Casey. The authors also claim that the Draft Activity Centre Strategy will help promote urban development that is economically, socially, and environmentally sustainable. It appears to me that the authors of this Activity Centre Strategy /258 have NOT been informed about Casey's "Re-vegetation crisis" - as detailed on Casey's Conversations front page- which tells its readers that in fact this municipality has NOT been developing in a sustainable way because - under Casey council's planning- our natural environment has been damaged so much so that less than 7% of native vegetation is now left across the municipality? Casey's "Re-vegetation crisis" and "Activity Centre Strategy" are NOT separate issues but are interconnected by Casey council's vision of the future which has ignored the fragility and capacity of the natural environment to sustain continuous urban expansion? In my view, the Draft Activity Centre Strategy /C258, as it is written, needs to be rewritten and updated to take into account Casey's Re-vegetation crisis and clearly state how the natural environment and ecology deficits will be addressed in future.

Step 6. Upload your submission from your own files.

No Answer

29 November 2019

City of Casey
Planning Reform and Strategic Planning
Bunjil Place, 2 Patrick NE Drive
Narre Warren VIC 3805

Dear Sir/Madam,

Re: Submission to Planning Scheme Amendment C258

Council Officers from Cardinia Shire Council generally support the Amendment C258 and request no changes.

We would like to commend the City of Casey on developing the Activity Centre Strategy which provides guidance for the 80 activity centres within the municipality, ranging from metropolitan to local in size. The objectives and strategies applied will assist in ensuring enough land is set aside for employment to provide jobs for current and future residents, by increasing local jobs close to where people live.

We also support Casey's goal to achieve a broader range of uses within the activity centres, with the Activity Centre Strategy identifying non-retail use targets of 40% for Metropolitan, 30% for Medium and 25 % for local activity centres which should ensure the floor space available can support other types of non-retail employment.

We would like to understand and explore the impact of the proposed aspirational major activity centres specifically relating to the economic assessment floor space, population and feasibility with the nearby catchment.

Continued collaboration between City of Casey and Cardinia Shire Council is important to ensure our future employment land (including future Precinct Structure Planning) is utilised and planned for strategically at a local as well as at the regional level. Cardinia Shire Council would like to continue to work with the City of Casey to plan employment areas to allow for a range of services and uses which will reduce travel times and costs for residents in both municipalities.

If you have any queries regarding this submission, please contact [REDACTED]
or [REDACTED]

Kind regards,

[REDACTED]
Manager Policy Design and Growth Area Planner

Submission 5

From: [Casey Conversations](#)
To: [REDACTED]
Subject: 1452ws completed Send your Submission
Date: Tuesday, 17 December 2019 1:17:17 PM

1452ws just submitted the survey 'Send your Submission' with the responses below.

Step 1. Please provide your full name.

Rev Wendy Anne Snook

Step 2. Please provide a valid email address.

[REDACTED]

Step 3. Please provide your phone number.

[REDACTED]

Step 4. Please provide your postal address.

[REDACTED]

Step 5. Please type your submission here or go to Step 6 to upload your submission from your own files.

This is a submission to amendment C258. I recently attended the Activity Centre Strategy event at Bunjil place. My comments included that when designing Activity Centre hubs, there needs to be safe places for the marginalised, the less-well-off, the migrants and refugees, the mentally-ill and the homeless to gather, as well as the affluent and well-off people. To have a safe place for the homeless and marginalised, includes shelter during the day in public areas, as well as social housing, toilets that are open in the day and the evenings, (unlike current practice in Cranbourne near the bus station), good lighting, easy public transport access, perhaps a place to store a backpack/ bag for a few hours? and some security / police availability. E.g. when the Uniting Church's food truck is present four nights a week 6-8pm at Lyall St Cranbourne bus station, there are usually no problems with bad behaviour. The police are nearby and are known to be able to be called by the volunteer staff. However at after school hours 3-5pm, there is frequent bad behaviour there in Lyall St by some youths bullying others . It is not a safe place at that time. There is no supervision or responsible people around. Berwick also has marginalised and poor people, but they are less visible than in Cranbourne. e.g. people living in garages and boarding houses. Even the elderly can be impoverished. So you do not see them in the trendy cafes on Princes Highway, as they can't afford the food prices. Where do they find social inclusion and places to gather? Obviously our church, St Andrews Berwick Uniting Church on Princes Highway service road, 105 High Street Berwick) is one such place.(By the way, Google maps has us located in the middle of the highway! See www.latlong.net for our accurate position on the edge of the Berwick Village Activity Centre). The Casey Uniting congregations and Uniting, our charitable agency, are very active in the area, and would like to discuss future possible partnerships in service provision sometime. Thank you for your willingness to listen. Blessings Rev Wendy Snook.

Step 6. Upload your submission from your own files.

No Answer

19 December 2019

[REDACTED]
Senior Strategic Planner
City of Casey
PO Box 1000
Narre Warren, Victoria 3805

Dear [REDACTED]

Westfield Fountain Gate – Scentre Group
Submission to Amendment C258 to the Casey Planning Scheme

Scentre Group acts for the owners of the Westfield Fountain Gate Complex and surrounding land, and we refer to proposed Amendment C258 to the Casey Planning Scheme.

The landholding is significant, and Scentre Group are a major stakeholder in any future planning for the Fountain Gate / Narre Warren CBD, and we thank Council for the briefing prior to the formal exhibition of the Amendment.

Based on the Explanatory Report that forms part of the exhibited documentation, we understand that in so far as the Amendment relates to the Westfield Fountain Gate Complex, the Amendment proposes to:

- Introduce a new 'Activity Centres Policy' at Clause 22.01 to replace the existing 'Retail Policy';
- Amend the existing 'Non-Residential Uses in Residential and Future Residential Areas Policy' at Clause 22.02;
- Make consequential changes to Council's Municipal Strategic Statement; and
- Implement the 'City of Casey Activity Centres Strategy 2019'.

The Explanatory Report also notes that the principal objective underpinning the Amendment is to update Council's Activity Centres Strategy 2012 to create more business certainty for existing activity centres, introduce new growth area centres and to better align local policies with the State Government Metropolitan Strategy.

The recommendations in the proposed '*City of Casey Activity Centres Strategy 2019*' informing the Planning Scheme Amendment process generally include:

- A focus on job creation within activity centres with specific emphasis on non-retail employment;
- A revised hierarchy of centres;
- Policy direction to balance the growth of existing centres with that of newer centres in greenfield areas;

SCENTRE GROUP

- The need to respond to the ascendance of online retailing and large format discount retail formats; and
- Policy direction for ‘out-of-centre’ non-residential uses in residential areas, such as child-care, medical centres and places of worship.

We note that Fountain Gate is defined as a Metropolitan Activity Centre. The proposed Clause 22.01-5 ‘Employment in activity centres’ includes the following objective, policy and policy guidelines:

Objective

To encourage a greater amount of commercial office space and cater for an increase in non-retail jobs in activity centres.

Policy

It is policy to:

- *Support commercial development that is designed with flexible floor plans to provide a range of accommodation options for businesses and to allow for future adaptive reuse.*
- *Encourage development to be at least three storeys within Metropolitan Activity Centres, and at least two storeys within Major and Medium Neighbourhood Activity Centres.*
- *Support development of variety of work space options and sizes that cater for a varying sized businesses including those businesses that are growing.*

Policy guidelines

It is policy to assess proposals against the following criteria:

- *Developments of over 1,000 square metres should provide leasable floorspace to non-retail uses consistent with the role and function of the centre and centre wide targets identified in Table 1.*

Table 1: Floor area targets for activity centres

Typology	Centre wide target
Metropolitan Activity Centre	Approximately 40 per cent non-retail commercial, institutional and community uses floor area for the whole of the centre.
Major Activity Centre	Approximately 30 per cent non-retail commercial, institutional and community uses floor area for the whole of the centre.
Medium Neighbourhood Activity Centre	Approximately 25 per cent non-retail commercial, institutional and community uses floor area for the whole of the centre.
Local Neighbourhood Activity Centre	Approximately 25 per cent non-retail commercial, institutional and community uses floor area for the whole of the centre.

*Notes: For activity centres in growth areas where a Precinct Structure Plan (PSP) applies, refer to the PSP for a specific retail and/or commercial floorspace target.
Floorspace areas/percentages are typical only and are not caps.*

SCENTRE GROUP

As communicated in meetings with Council officers, Scentre Group are supportive of the proposed Amendment to implement the 'Casey Activity Centres Strategy 2019' however we have concerns regarding the following:

- The regulatory nature of the policy, particularly at proposed Clause 22.01-5 where policy 'controls' such as encouraging development of at least three storeys in Metropolitan Activity Centres and, for developments over 1,000 square metres, should provide approximately 40 per cent non-retail leasable floor area for the whole of the centre.
- The Casey Activity Centres Strategy 2019 is acknowledged as a document looking at a planning horizon to 2036, however the proposed Clause 22.01-5 'Employment in activity centres' fails to acknowledge the need for short, medium and long term aspirations for the Fountain Gate-Narre Warren Metropolitan Activity Centre. Staged aspirations are a way to manage expectations around achieving the performance measures within Council policy, of which is influenced by market demands which will change with the maturing of the activity centre over time.

The performance measures of the Local Planning Policy should be used to enable and encourage non-retail investment in the centre. A positive and flexible planning framework approach would be consistent with what was achieved in the approved Casey Planning Scheme Amendment C224 which gave effect to the objectives and strategies contained in the Fountain Gate-Narre Warren Structure Plan, 2016.

To this end, we recommend the following amendments:

Policy

- Encourage *intensive* development *where a new building/s is proposed* to be at least *two to three storeys* within Metropolitan Activity Centres, and at least two storeys within Major and Medium Neighbourhood Activity Centres *where practicable*.

Policy Guidelines

- ~~Developments of over 1,000 square metres should provide leasable floorspace to non-retail uses consistent with the role and function of the centre and centre wide targets identified in Table 1.~~
- Delete Table 1: Floor area targets for activity centres.

SCENTRE GROUP

Table 1: Floor area targets for activity centres

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Metropolitan Activity Centre	Approximately 40 per cent non-retail commercial, institutional and community uses floor area for the whole of the centre.
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*Notes: For activity centres in growth areas where a Precinct Structure Plan (PSP) applies, refer to the PSP for a specific retail and/or commercial floorspace target.
Floorspace areas/percentages are typical only and are not caps.*

We thank Council for the opportunity to prepare this submission to Planning Scheme Amendment C258 and we look forward to further consultation with Council regarding the matters raised.

Should you wish to discuss this further please do not hesitate to contact the undersigned.

Yours sincerely,

[Redacted Signature]

[Redacted Name]

Development & Strategic Asset Management

Email: [Redacted Email]

Phone: [Redacted Phone]



20 December 2019

Senior Strategic Planner
Casey City Council
via email: [REDACTED]

Dear [REDACTED]

SUBMISSION TO PLANNING SCHEME AMENDMENT C258

Urbis Pty Ltd act on behalf of BC Lynbrook Pty Ltd with respect of their interests at 760 South Gippsland Highway, Lynbrook. We write in relation to Planning Scheme Amendment C258 and the updates proposed to the Activity Centres Strategy and the Local Planning Policy Framework.

Our client currently has three live planning permit applications on the site located at 760 South Gippsland Highway, Lynbrook (PlnA00329/19 - Hotel, PlnA00328/19 – Convenience Restaurant, PlnA00705/19 – Medical Centre).

Our client has a number of concerns regarding the proposed Amendment, which seeks to:

- Implement the City of Casey Activity Centre Strategy 2019;
- Amends Clause 21.05 (Economic Development) of the Casey Planning Scheme;
- Replaces Clause 22.01 (Retail Policy) with a new Clause 22.01 titled 'Activity Centre Policy in the Casey Planning Scheme';
- Amends Clause 22.02 (Non Residential Uses in Residential and Future Residential Areas Policy) of the Casey Planning Scheme; and
- Amends multiple clauses of the LPPF to reflect the new activity centre hierarchy, including updated recommendations of the City of Casey Activity Centre Strategy 2019.

With respect to Amendment C258, our key concern is that our client's site has been omitted from the Activity Centre Strategy 2019 and has not been nominated as any form of commercial precinct. We are of the view that this is contradictory to the Lynbrook and Lyndhurst Development Plan (2015) which nominates the subject site as a mixed-use precinct.

By way of background, our client's site is located within the General Residential Zone, which allows for a limited range of non-residential uses. The site is also located within 500 metres of the Hampton Park Recovery Precinct. EPA are not supportive of any sensitive land uses within the buffer area. This has been made evident during the assessment of our three applications, which the EPA is not supportive of any of the land uses proposed, including the convenience restaurant and medical centre which are both considered to non-sensitive land uses.

Given the constraints in relation to the zoning of the land and the location within the 500 metre buffer area, we are of the view that the General Residential Zoning is not the most appropriate zone for the

land and the site would be better suited to Commercial or Mixed Use Zoning to allow for a wider range of non-sensitive non-residential uses to be developed on the site.

With this in mind, our key concerns with respect to Amendment C258 are summarised below:

- Council have previously advised of their support to rezone the land at 760 South Gippsland Highway to accommodate land uses which are not permissible within the General Residential Zone. However, they have advised that a rezoning would need to be in line with Council's Policies and Strategies
- The omission of the site from the Activity Centres Strategy 2019 will hinder the rezoning the land to a Commercial or Mixed Use Zone, as any rezoning would not be in accordance with Council's Activity Centres Strategy and Local Planning Policy Framework
- It is evident that the current zoning of the land and the distance from the Hampton Park Recovery Precinct has created difficulties with developing the land and many of the non-residential uses permissible within the General Residential Zone will not be supported by the EPA and Council
- The inclusion of an additional policy objective in Clause 22.02 (Non-Residential Uses in Residential and Future Residential Areas Policy) which looks to *support non-sensitive non-residential uses in residential areas where land is within a buffer of an offensive land use* will further reinforce Council and the EPA's position
- The EPA's definition of non-sensitive land uses is not clear and it is evident that the EPA has been opposed to our applications for a convenience restaurant and medical centre, which we would consider both non-sensitive non-residential uses

Given the constraints of the site due to the zoning and proximity of the existing landfill, it is considered that our site should be considered as a future commercial precinct within the Activity Centres Strategy 2019. This would ensure that any rezoning would be in accordance with Council's Policies and Strategies.

We appreciate the opportunity to participate in the public consultation process and look forward to working closely with Council. If you have any questions please don't hesitate to contact me at [REDACTED]

Yours sincerely,

A large black rectangular redaction box covering the signature of the Senior Consultant.

[REDACTED]
Senior Consultant

Our ref: **REA:20192237**

Your ref:

Direct dial: [REDACTED]

Direct email: [REDACTED]

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23 December 2019

[REDACTED]
Strategic Projects Planner
City of Casey

By Email: [REDACTED]

Dear [REDACTED]

Amendment C258 City of Casey Activity Centres Strategy 2019

We act on behalf of ISPT Pty Ltd and Vicinity Centres, the joint owners of the Cranbourne Park Shopping Centre located in Cranbourne.

Our client wishes to make a submission in respect of Amendment C258 to the Casey Planning Scheme, which seeks to implement the findings of the new *City of Casey Activity Centres Strategy* and undertake consequential changes to the Casey Planning Scheme (**Amendment**).

ISPT and Vicinity make this submission to:

- Ensure that the established Cranbourne Park Shopping Centre is acknowledged and appropriately referenced in the new Activity Centre Strategy and the updated activity centre hierarchy;
- Ensure that from a planning perspective the long-term role and function of the centre is not impacted by any proposed changes in the hierarchy; and
- Ensure that the revised strategy appropriately sets clear parameters whereby new out-of-centre proposals are considered, noting that the addition of any new centre should not be to the detriment of the established activity centre hierarchy.

This submission is broken down into several sections relating to the Cranbourne Park Shopping Centre, the Strategy, the Action Plan and the Amendment.

Cranbourne Park Shopping Centre

The Cranbourne Park Shopping Centre is an integral part of the Cranbourne Major Activity Centre (MAC) and has long been the key retail node. The Cranbourne MAC is an established activity centre within the retail hierarchy. It plays a significant role in providing for the needs of the resident community within its catchment and has benefited from continued investment by its respective owners since its construction.

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Built in 1979, the centre was most recently significantly redeveloped in 2015 and is now anchored by Kmart, Target, Harris Scarfe, Coles and Woolworths Supermarkets and includes over 100 specialty stores.

The Shopping Centre and the broader Major Activity Centre face significant competition from existing centres within Casey such as Fountain Gate-Narre Warren Metropolitan Activity Centre (which we acknowledge currently sits above Cranbourne Park in the retail hierarchy established through Plan Melbourne) but also other Major Activity Centres in adjoining municipalities.

Our client welcomes Council's commitment to advocating for the designation of Cranbourne Major Activity Centre as a Metropolitan Activity Centre in the forthcoming 5 year review of Plan Melbourne. We believe that Cranbourne rightly should be recognised as it fulfils the definition:

These are higher-order centres intended to provide a diverse range of jobs, activities and housing for regional catchments that are well served by public transport. These centres will play a major service delivery role, including government, health, justice and education services, as well as retail and commercial opportunities (Source, Plan Melbourne).

In seeking the elevation of Cranbourne to a Metropolitan Activity Centre (and on par with Fountain Gate – Narre Warren) it is essential that the Retail Strategy and the new local planning policy both work to support the centre to expand not only the retail offer but the full range of commercial and other services warranted and expected by the community.

The Activity Centres Strategy

We have reviewed the exhibition version of the Activity Centres Strategy, 2019 (**Strategy**) and provide the following comments:

- Our client strongly supports the consolidation of activities into one location, being activity centres. Existing activity centres, particularly Major Activity Centres, must be supported for their ongoing role and function and their ability to expand through redevelopment, thus, ensuring even greater consolidation of activities in core locations.¹
- Our client strongly supports the Strategy acknowledging the importance of aspirational centre classifications in relation to the Cranbourne Major Activity Centre. We endorse the Strategy's acknowledgment that the Cranbourne Major Activity Centre has the potential for growth beyond its current centre type classification. Whilst presented as 'aspirational' in the report, we believe this is a realistic outcome based on the strong population growth in the catchment and the fundamentals of the centre including: access to fixed line transport, provision of a range of retail goods and services, provision of a range of regional community services, provision of a range of employment opportunities²

¹ City of Casey Activity Centres Strategy 2019 (Page 7)

² Ibid (Page 17)

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- It is apparent that to keep a strong activity centre network, out-of-centre use and development should be regulated. In recent times, there are examples in other municipalities of what we would consider to be core retail uses (i.e. large-scale supermarkets above 1800 square metres) being approved in Commercial 2 Zoned land. We believe that Council should be closely monitoring the potential use of Commercial 2 Zoned land for such proposals and that the Strategy should go further in providing policy advice for the scale of shop and supermarket floorspace appropriate in these locations.
- Clause 17.02-2S of the Policy Planning Framework sets out the objective 'to manage out-of-centre development.' Strategies in support of this objective include to 'Ensure that out-of-centre proposals are only considered where the proposed use or development is of net benefit to the community in the region served by the proposal or provides small scale shopping opportunities that meet the needs of local residents and workers in convenient locations.' It is important that the Local Planning Policy provides a robust framework for out of centre proposals to be discouraged where they will undermine the activity centre hierarchy.
- Based on our client's concerns of the potential for new retail floorspace on Commercial 2 Zones to actively erode the primacy of other centres, the Strategy and Local Policy should be more explicit in confirming how this land may fit within the hierarchy. From our client's experience the role of Commercial 2 land transforming into a competitive retail centre is far less regulated than a proposal for a similar sized centre in a residential zone – although each may have the same impact on the existing centre network. This is an area where the Hierarchy of Centres Objective could be strengthened as well as the Out-of-Centre Location Assessment where proposals are for Section 2 – Permit Required Retail Uses.
- We note and support the Strategy's discussion in relation to the aims of Objective 11, which seeks to increase non-retail jobs in centres and includes policy directions to increase non-retail floorspace in Casey's activity centres by encouraging buildings with a minimum of three storeys in new development proposals located in metropolitan and aspiring to metropolitan activity centres.³
- We note that the Strategy:
 - seeks to encourage more non-retail in Metropolitan and Major activity centres; and
 - has set a 'target' for non-retail floorspace targets of 40 per cent for Metropolitan and 30 per cent in Majors.⁴

The Strategy discusses that the above sets the minimum acceptable building height and amount of non-retail floorspace. Practically, we have concerns on how this may

³ Ibid (Page 40)

⁴ Ibid (Page 40)

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play out for locations such as Cranbourne Park which are traditionally retail focused and how Council will interpret this target on an individual application basis.

- Strategy 11.1 expresses the desire for any new non-residential floorspace in centres to be developed in a way that allows for feasible future adaptive reuse (e.g. grocery store adaptively reused as office). Whilst our client supports the desire for efficiencies in development outcomes, we believe that this is a first principle only and consider there are realities to the construction of certain retail developments that would not accord with this aspiration. A supermarket footprint of some 4,000sq.m could not for example be readily converted into an office development given the setbacks from windows etc. Further thought is needed in relation to this element.
- As noted above, whilst our client supports the desire of this strategy to encourage activity centres to provide for more non-retail type uses, we recommend that the requirement for at least 25% of the lettable floorspace of new developments be provided for non-retail uses be assessed on a case by case basis ensuring that the viability of new development is not undermined (noting that the Activity Centres Strategy Background Report states that the floorspace and building height targets are discretionary planning policies and not prescriptive standards).⁵
- For strong and vibrant activity centres, recognition of the role and function of centres, the investment that has been made in the centres and the potential future investment is critical. In a retail environment which is still growing and where centre locations are defined but possibly not built, the need for 'out-of-centre' development proposals is questioned.

The action plan

- The intent of the Action Plan to implement key actions stemming from the Strategy is supported. It will be necessary to review progress work on the low, medium and high priorities in a timely manner to ensure there is no delay in actioning this key strategy within the municipality of Casey. It has no planned status in the planning scheme.
- Our client supports the push for Metropolitan Activity Centre status of Cranbourne Major Activity Centre in the 5-year review of Plan Melbourne.
- As a general principle, our client agrees with the need to review schedule 1 to the Activity Centre Zone (Cranbourne Town Centre) to implement the Cranbourne Town Centre Structure Plan 2018 and look forward to Council progressing this initiative to a planning scheme amendment stage.

The amendment

We provide the following commentary:

- Clause 21.01 (Regional Context Map)- The annotation on the map in relation to the Cranbourne Town Centre should be changed to "*Cranbourne Major Activity Centre*".
- Clause 21.05-7 Table 1: Casey activity centres typology: The wording in relation to the support for Restricted Retail precincts should have a strong focus on restricted

⁵ Activity Centres Strategy Background Report Page 16.

RIGBY COOKE LAWYERS

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retail uses, with a small amount of hospitality uses that support the restricted retail businesses could be further developed. Many of the Restricted Retail Precincts are developed on Commercial 2 zoned land. In the C2Z, a supermarket of up to 1,800sq.m is permitted as of right with up to 500sq.m of specialty shop uses – a permit can be sought for a larger supermarket and more specialty shops. Council should consider a more explicit comment such that whilst small supermarkets are permissible, in relation to larger supermarkets, unless nominated as shop based activity centre, such a proposal is not consistent with policy.

- Clause 21.15-2 Objectives (fifth bullet point) - We recommend rewording to the following:

To ensure the Cranbourne Major Activity Centre maintains its present role and aspiration to become a Metropolitan Centre whilst serving the additional significant residential growth forecast for the area.

- Clause 22.01-3 Activity Centre Network- Policy (First bullet Point) - our client strongly supports the discouragement of development of supermarkets where they are not part of an integrated component of the activity centre with other retail or commercial development. For activity centres to be thriving and viable places for people to work and visit, ad hoc development of existing or planned centres should be strongly discouraged, particularly where large format supermarket developments are proposed, which in most cases poorly integrate with surrounding development due to their 'boxy' style built form (this goes again to the commentary earlier).

Summary

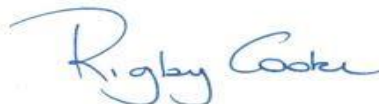
The Cranbourne Park Shopping Centre is at the heart of the Cranbourne Major Activity Centre. As a Major Activity Centre, which is aspiring to be a Metropolitan Centre as defined by Plan Melbourne, its role and function in the hierarchy of centres is pivotal in helping to meet the needs of the resident and working population within its catchment.

As joint owners of the Cranbourne Park Shopping Centre, our client relies on a strong policy framework being put in place to provide certainty for future investment. We request the Planning Authority to have regard to the content of this submission and the desire to ensure the Strategy supports the continued important role and function the Cranbourne Major Activity Centre will play into the future.

Our client reserves its right to further develop this submission at any Panel Hearing in relation to Amendment C258.

If you have any questions in relation to this submission, please contact [REDACTED] on [REDACTED]

Yours faithfully



Rigby Cooke Lawyers



Attn: [REDACTED]
Senior Strategic Planner
City of Casey
PO Box 100
NARRE WARREN VIC 3805

Date: 23 December 2019

**Re: Objecting Submission to Amendment C258 to the Casey Planning Scheme
Eden Rise Shopping Centre
1 O'Shea Road - Berwick**

Dear [REDACTED],

We act for Charbury Proprietary Limited, the owner and operator of the Eden Rise Shopping Centre, located at 1 O'Shea Road, Berwick.

Our client has reviewed proposed Amendment C258 to the Casey Planning Scheme (the Amendment) which would implement the *City of Casey Activity Centre Strategy 2019*. It makes this submission in opposition to the Amendment in its current form, and more particularly, to those components of the Amendment that concern Berwick South.

It is our client's principal submission that the proposals to nominate the Berwick Springs commercial land use cluster as a 'Future Neighbourhood Activity Centre' within the Activity Centre Strategy, to elevate the potential combination of the Eden Rise centre with Berwick Springs as an 'Aspiring Major Activity Centre', and to embed these outcomes within the MSS and local planning policy framework, are substantially lacking in strategic planning and land use economics justification and should be abandoned as part of the Amendment.

This is principally because:

- Eden Rise will function effectively as a Medium NAC in the short to medium term, and is capable of accommodating additional retail floorspace consistent with this designation, such that there is no proper basis to designate Berwick Springs as a further NAC within Berwick South;
- There is no potential to effectively integrate the two land-holdings such that the creation of two NACs in this location (let alone a potential future MAC) would result in an unsustainable and unworkable outcome that would be contrary to contemporary activity centre planning (including a number of the policies that are said to underpin this amendment); and
- The strategic and economic analysis undertaken in respect of the Amendment is deficient in a number of respects and fails to recognise other existing and future planned neighbourhood activity centres in the vicinity of Berwick South.

To this end, proposed Amendment C258 should delete all references to Berwick Springs as a Medium NAC, and to the potential for Berwick Springs and Eden Rise to potentially function as a MAC.

1.0 SITE CONTEXT AND PLANNING HISTORY

1.1 Eden Rise shopping centre

The Eden Rise shopping centre is located at the south-east corner of O'Shea Road and Clyde Road, Berwick South.

The shopping centre comprises approximately 1.3 hectares of land, which accommodates multi storey buildings accommodating a variety retail and commercial premises, as well as at-grade car parking around the site.

A total of 11,536 square metres of retail floor area is provided within the on-site facilities, including a 6590 square metre, 'full line' Coles supermarket, a 1352 square metre Aldi supermarket, a variety of smaller retail premises, a medical centre, a service station and motor repairs, health and fitness facilities and offices.

The western half of the site, fronting Clyde Road comprises car parking for 652 vehicles, with site access provided from both O'Shea Road and Clyde Road. Clyde Road is a designated Road Zone 1 and comprises a divided six-lane major road.



Figure 1 – site context and zoning plan

The full extent of the shopping centre site is zoned Commercial 1, as depicted in Figure 1 above.

Within the existing Casey Planning Scheme's local planning policy framework, it is noted that:

- Clause 21.10 Berwick Southern Area's local policy strategies include:

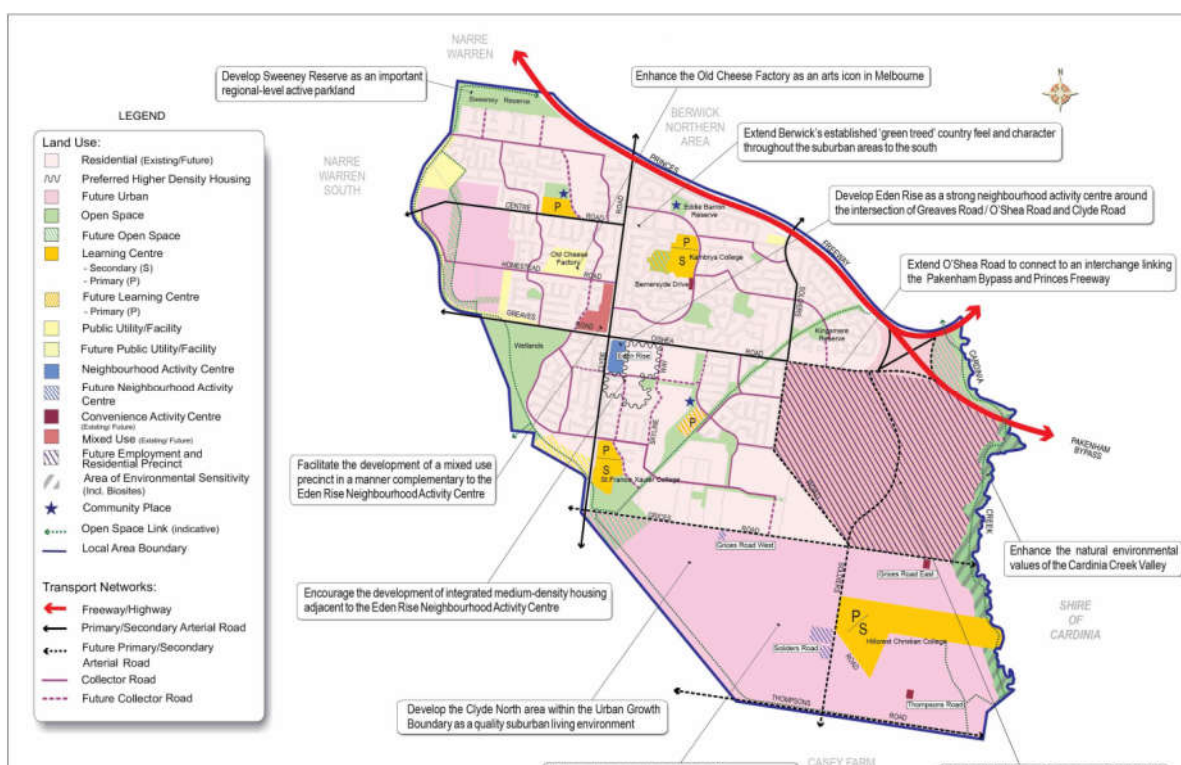
Develop a strong neighbourhood activity centre (Eden Rise) based around the intersection of Greaves Road/O'Shea Road and Clyde Road in Berwick.

Develop 'Minta Farm' as an integrated and diverse employment precinct for the Berwick region, incorporating office, research, manufacturing, learning, and living components.

Upgrade Greaves Road/O'Shea Road to an arterial road standard to cater for an extension of O'Shea Road to connect with the Princes Freeway/Pakenham Bypass interchange.

(our emphasis)

These strategies are included within the Berwick Southern Area Local Area Map:



The preparation of a structure plan for the Eden Rise Neighbourhood Activity Centre is identified as 'further strategic work' under the policy. This has not yet occurred.

With respect to recent planning approvals, it is noted that Planning Permit No. Pln00992/08 B was issued by Council on the 27th of May 2008. The Planning Permit allows for *'the use and development of the land for a shop, medical centre (2 practitioners) and offices, and reduction in car parking for the development of Stage 2 of the Eden Rise Shopping Centre'*.

1.2 Berwick Springs

The Berwick Springs mixed use area is wholly contained within the General Residential 1 Zone and Development Plan Overlay Schedule 1. It has developed incrementally, with planning permits having been granted for each of the key developments presently on site, being a hotel, food and drink premises and other retailing activities permissible under the residential zone.

This land is not identified in the Casey Planning Scheme MSS as any type of activity centre. It is identified only as a *'mixed use area'*.

Within the existing Casey Planning Scheme's local planning policy framework, it is noted that:

- The Clause 21.10 Berwick Southern Area's local policy strategies do not include any reference to a future rezoning of the Berwick Springs land but rather it is only identified on the Berwick Southern Area Local Area Map as an area for *'the development of a mixed use precinct in a manner complementary to the Eden Rise Neighbourhood Activity Centre'*.

The land uses accommodated on the developed portion of the landholding are permissible under a residential zone.

It is understood that in recent years Council officers have been engaged in discussions with the Berwick Springs land owner to prepare a planning scheme amendment for the re-zoning of the site. We note with interest that the following was referenced in Item 7.2 of the Amendment C258 Officers' Report dated 2 April 2019 (*inter alia*):

At its meeting on 21 June 2016 Council, in adopting Officer's Report Item 6.12, resolved:

4. *That the amendment request to rezone the land at 248-296 Clyde Road, Berwick to facilitate the development of a new Neighbourhood Activity Centre be further considered by Council following the adoption of the revised Activity Centres Strategy and in conjunction with an amendment to implement the revised strategy in the Casey Planning Scheme.*

Officers have now prepared a revised Activity Centres Strategy and Planning Scheme Amendment C258 to implement the policy directions of the Strategy. This work is informed by extensive public consultation, which included community surveys and in-depth industry stakeholder interviews, and an economic assessment of retail and other employment floorspace needs.

Officers are working with the owners of 248-296 Clyde Road, Berwick to prepare a planning scheme amendment for the rezoning of the site. The revised Activity Centres Strategy designates the site as a Medium Neighbourhood Activity Centre. Work is progressing on preparation of a planning scheme amendment to rezone this land from a General Residential Zone to a new Comprehensive Development Zone to reflect its proposed status as an activity centre and to increase in commercial jobs in the area. Consideration of this amendment will be brought before Council at a future meeting.

It is understood that a planning scheme amendment has not yet been prepared on these terms. Furthermore, Charbury Proprietary Limited is unaware of any previous strategic assessment having been undertaken justifying the establishment of non-residential uses on the Berwick Springs landholding.

Rather, it appears the proliferation of the existing non-residential uses has occurred opportunistically, though amendments to the relevant Development Plan that shifted the desired land use from medium density residential development to non-residential development.

Our client will be carefully monitoring the progress of any amendment prepared in respect of the Berwick Springs land through Council's processes. As a nearby land owner it should be provided direct notice of any such amendment.

2.0 CITY OF CASEY ACTIVITY CENTRE STRATEGY 2019

This Strategy was prepared in 2019 and seeks to synthesise the assessments provided by the:

- *Casey Activity Centres: Retail and Other Employment Floorspace Assessment, Final Report*, SGS for the City of Casey, November 2017 ("SGS Report"); and
- *Activity Centres Strategy Background Paper, 2019*, City of Casey ("Background Paper")

The Activity Centre Strategy 2019 updates earlier strategic planning work carried out in 2006 and is, accordingly, of limited currency.

The 'Background paper' states that it '*builds on the Retail and Other Employment Floorspace Assessment recently completed by SGS Economics & Planning Pty Ltd for the City of Casey (Employment Floorspace Assessment). The paper, together with the Employment Floorspace Assessment, detail (sic) the strategic justification for the directions of the 2019 Casey Activity Centres Strategy and Action Plan where that strategy is not set out in the Strategy itself.*

3.0 PROPOSED AMENDMENT C258

Amendment C258 implements the *City of Casey Activity Centre Strategy 2019* by:

- Amending Clause 21.05 Economic Development to (inter alia):
 - o update and reflect the Activity Centre hierarchy as proposed by the *Strategy*, inclusive of the detailed 'Casey activity centres typology', which details the role of function of each activity centre type;
 - o reference Eden Rise and Berwick Springs as (existing) 'Medium Neighbourhood' activity centres; Bemersyde Drive as a 'Local Neighbourhood' activity centre; and Minta Farm as a 'Medium Neighbourhood (Proposed)'.
- Amending Clause 21.10 – Berwick Southern Area to:
 - o include a new strategy at Clause 21.10-3 which seeks to '*support the consolidation of Eden Rise Medium Neighbourhood Activity Centre and Berwick Springs Medium Neighbourhood Activity Centre into a major activity centre*';
 - o delete an existing strategy at Clause 21.10-3 which seeks to '*develop a strong neighbourhood activity centre (Eden Rise) based around the intersection of Greaves Road / O'Shea Road and Clyde Road in Berwick*'
 - o amend a strategy under Implementation at Clause 21.10-4 (*inter alia*) '*to use the Activity Centres Policy at Clause 22.01 to provide for the orderly development and expansion of activity centres, including the Eden Rise 'medium' neighbourhood activity centre*';
 - o refer to Eden Rise as a 'medium neighbourhood activity centre' under 'application of zones and overlays at Clause 21.10-4;
- Replacing the 'Retail Policy' local planning policy at Clause 22.01 with an 'Activity Centres Policy', wherein it is policy to (inter alia):
 - o *Support the growth of existing and proposed neighbourhood activity centres in growth areas to provide places for social interaction and safe pedestrian movement, and the early establishment of anchor uses including supermarkets or large offices to provide a foundation for the activity centre to build upon* (Clause 22.01-3);
 - o *Encourage development to be at least three storeys within Metropolitan Activity Centres, and at least two storeys within Major and Medium Neighbourhood Activity Centres, with floor area targets set for all activity centres* (Clause 22.01-5);
 - o *Support diverse retailing formats, such as discount department stores in Major Activity Centres and 'mini-major' stores where there is a demonstrated need in Major and Medium Neighbourhood Activity Centres* (Clause 22.01-6);
 - o *Locate on-street parking spaces near entrances of shops for short-term car parking, with the majority of car parking provided behind the building façade* (Clause 22.01-7);
- Introducing policy guidelines, which are also detailed under Clause 22.01-7, as follows:
 - o *Place building facades on street frontages at ground level in retail and commercial mixed-use areas, to activate the street through entrances and extensive glazing at all levels;*
 - o *Provide car parks that do not dominate the streetscape, with any at-grade car parking appropriately landscaped.*
- Amending Clause 22.02 Non-Residential Uses in a Residential and Future Residential Areas Policy to ensure that these uses are located to minimise amenity impacts on residential areas and to avoid undermining the role of activity centres.

4.0 KEY SUBMISSIONS

Our client does not object to the Council's desire to implement a more sophisticated, up-to-date Activity Centres Strategy to guide land use and development outcomes in the City of Casey.

This municipality has experienced rapid population growth and development over many years; it has morphed from a growth area municipality to one which combines well-established urban areas with ongoing growth areas, as well as rural areas.

However, great care is required to ensure that the sound strategic work which underpinned Casey's rapid development is not undermined by ad-hoc alterations to the established activity centre hierarchy and framework. Amendments of this type must have sound strategic justification and be underpinned by robust data that establishes a clear need for change.

4.1 The amendment's strategic planning deficiencies

The contents of the 'Strategy' underpinning this amendment are remarkably 'light on'. A reader must dig their way back through the Background Paper and the SGS Report to gain any understanding of the genesis of most of the key recommendations. Critically, in the case of the treatment of the Berwick Springs land-holding, the strategic and economic justification is wholly lacking.

It is acknowledged that as the population continues to grow, retail (and all other activities) need to keep pace to service that population. As in other parts of the municipality, this will result in increased demand for retail provision in and around Berwick South. This notwithstanding, there is simply no proper strategic basis to elevate the status of Berwick Springs in the manner proposed.

Eden Rise is presently designated as a NAC and functions effectively in this capacity. It has clear scope to perform effectively as a medium NAC (as designated under the Strategy) in the short to medium term and to accommodate any requirements for additional retail floorspace (including most significantly the provision of another full-line supermarket).

It is important to note, however, that the existing Eden Rise shopping centre has consistently had retail vacancies, and that in more recent times, these vacancies have increased as the retail market has become more competitive and challenging. This centre is relatively new and benefits from anchor supermarket tenants such that these vacancies are representative of supply already outstripping demand. Considerable care accordingly needs to be taken before designating additional land as a NAC in such close proximity to the existing centre.

It is further submitted that Berwick Springs does not have the capability to integrate successfully with Eden Rise due to its physical separation from the established centre. Allowing further core retail premises to be developed within Berwick Springs would accordingly be a poor outcome for the community and the functionality of the Neighbourhood Activity Centre (NAC). Further, because they are not capable of being effectively combined or integrated, they fail all applicable tests for to justify elevation to a 'Major Centre' designation.

It is considered that the recategorization of Eden Rise and Berwick Springs, in the context of surrounding existing and proposed centres, will negatively impact the operation of not only these centres but also those in close proximity to it, as well existing the larger activity centres which include Eden Rise within either regional or sub-regional catchments.

Berwick Springs's role and function should be, as it already is, to complement the Eden Rise Activity centre and the Amendment does not advance any adequate strategic justification for altering the status quo in this regard.

4.2 Economic impacts of the proposed amendment on Eden Rise

The economic assessment associated with Amendment C258 is based on the assessments and conclusions provided within the “SGS Report”, which was completed in 2017 (and based on work completed in 2016). With respect to its assessment of Berwick South, the SGS Report has a number of deficiencies which limit its veracity in the context of the Amendment. These include that:

- The Retail floorspace estimation was completed without on-the-ground verification, with “project scope limitations” called out (page 23);
- Berwick Springs is identified as out-of-centre and, as such, apparently not analysed as part of the general modelling (page 34). However, at page 44 it is suggested that the “adjacent” Berwick Springs should be investigated for integration with Eden Rise;
- A key input to all modelling is pre-2016 Census population forecasts (page 54-55);
- The Minta Farm Medium Neighbourhood Centre is not identified on Figure 25 (page 43) or in Appendix E (note page 43 refers erroneously to Appendix G). This new centre will be 2.5 km to the east of Eden Rise;
- Table 9 indicates that Eden Rise could double in size, all else being equal (page 48). This being the case, there is no analysis as to why it is necessary or desirable to designate Berwick Springs as a NAC and future MAC;
- Table 13 is based on an assumption that real per capita spending on retail goods will increase at 1.4% per annum for the 20 years between 2016-2036 (page 59). This is considered to be far too high, with a figure of 0.5% per annum probably being more appropriate;
- A gravity model sits at the heart of all subsequent SGS calculations and decisions (page 72-73). This model is not sufficiently rigorous to be adopted in this context;
- Table 7 ‘upgrades’ Eden Rise to Major Centre status (page 77), but almost all of the capacity floorspace could be accommodated within the existing centre, even ignoring the development and operation of Minta Farm.

In relation to the Background Paper, we note that:

- The genesis and purpose of the Background Paper is stated up front:
 - o “The paper builds on the Retail and Other Employment Floorspace Assessment recently completed by SGS Economics & Planning Pty Ltd for the City of Casey (Employment Floorspace Assessment). The paper, together with the Employment Floorspace Assessment, detail (sic) the strategic justification for the directions of the 2019 Casey Activity Centres Strategy and Action Plan where that strategy is not set out in the Strategy itself”.
- Figure 1 reproduces Table 28 from the SGS Report (page 6). Note our comments above on this table and the implications for Eden Rise/Berwick Springs.
- Beneath Figure 1 is the first use of the term “Berwick South Central” and the “aspirational” designation as a Major Activity Centre (page 6). There is no corresponding strategic or economic justification for this designation.
- Eden Rise/Berwick Springs/Berwick South Central are discussed in more detail at the bottom of page 12 and at the top of page 13. It appears that Council wants a 2-step process – first designate Berwick Springs as a Medium NAC and then combine the 2 centres. Again, there is no evidence to substantiate the proposition that Berwick Springs is (or should be) a NAC today. Furthermore, it is not capable of being combined with Eden Rise, and the combined centre shouldn’t be elevated to Major Centre status.
- Minta Farm is again ignored in this report at Appendix C. Note that the Minta Farm PSP was gazetted in January 2019 and includes a Town Centre with up to 13,000 sqm of retail floorspace.

The economic analysis which underpins the Amendment is accordingly flawed and should not be relied upon by the Council in progressing the Amendment. Further, the Amendment does not advance any economic basis for elevating Berwick Springs to an activity centre, nor combining it with the Eden Rise activity centre. The Amendment does not actually assess the economic effects of doing so. There is no reliable analysis that demonstrates to what extent the Amendment and its recommendations may strengthen or weaken the Eden Rise activity centre, or any other activity centre.

For these reasons alone, the economic analysis underpinning the Amendment should be reconsidered and this component of it abandoned, until this work is completed.

4.3 Activity Centres Policy provisions

Our client acknowledges that the new Activity Centres policy at Clause 22.01 will provide Council, landholders and the community with policy guidance based on contemporary practice for activity centres.

With respect to the City of Casey, it is important to note that activity centres policy development must acknowledge:

- That the majority of trips are made by car-based transportation and all activity centres within the municipality rely on excellent vehicle access to be viable
- Activity centre planning needs to take account of this primary mode of transportation, where the need for visible, safe, convenient and accessible car parking are critical factors for the success of the smaller centres (Medium and Local NACs)
- There are inadequate public transport services throughout the municipality to link residential areas with activity centres

Further to our client's submissions outlined above which dispute the appropriateness of elevating the Berwick Springs land to a Medium NAC and then conjoin it with Eden Rise, we note that this outcome would be contrary to many of the proposed policy outcomes, including:

- Under Clause 22.01-3, the first dot point seeks to *'discourage the development of supermarkets where they are not part of an integrated component of the activity centre with other retail or commercial development'*. The identification of Berwick Springs as a Medium NAC would potentially allow for the development of a supermarket on that land, in a location that is distant from and not integrated with, the existing Eden Rise activity centre. This would be an unviable and detrimental outcome for the community, where supermarket facilities are disaggregated and physically distant.
- Under Clause 22.01-3, the fifth dot point seeks to *'support the growth of existing and proposed neighbourhood activity centres in growth areas to provide places for social interaction and safe pedestrian movement, and the early establishment of anchor uses including supermarkets or large offices to provide a foundation for the activity centre to build upon'*. As outlined above, Eden Rise has the potential to accommodate substantial growth, and as an integrated centre, will maximise opportunities for social interaction and safe pedestrian movement. If the activity centre was to be expanded to include the Berwick Springs land, the opportunities for social interaction to benefit from a visitor population critical mass, and safe pedestrian movement, would be severely and detrimentally diminished. Our client questions how the prospective conjoining of two physically isolated sites to become a larger activity centre could be considered appropriate, bearing this policy objective in mind.
- Under Clause 22.01-4, the objective for 'Out of Centre development' states that it seeks *'to ensure new retail and commercial development outside of designated activity centres does not compromise the activity centre hierarchy and results in a net community benefit'*. Currently Berwick Springs is identified as a *'mixed use area complementary to the Eden Rise Neighbourhood Activity Centre'*. It is, by definition, an out of centre development, reflected also

by its General Residential 1 zoning. Considerable caution should be exercised in the assessment of any applications to expand or intensify commercial land uses on this land.

The following further submissions are made concerning the proposed policy provisions:

- With respect to the policy guidelines under Clause 22.01-4, it is questioned why any applications for use development contrary to the role of function of the (sic) centre would be contemplated, where, in our client's view, such applications should be excluded from consideration.
- The policy objective and outcomes detailed at Clause 22.01-5 are largely supported for their potential to assist the creation of '20 minute neighbourhoods' and assisting the longer term impacts of 'escape expenditure' on the municipality's activity centre network.
- The policy objective and outcomes detailed at Clause 22.01-6 are largely supported, although, under the first dot point, our client questions why a local planning policy would specify types of retail activity for Medium NACS, particularly where Medium NACS are established elsewhere as having relatively small overall retail floor space offerings. It is submitted that reference to Medium NACs should be deleted from the first Policy dot point.
- The policy objective and outcomes detailed at Clause 22.01-7 are also broadly supported. With respect to the third dot point under Policy, the requirement that the majority of car parking be provided behind a building façade is both poorly worded and inappropriate having regard to smaller centres, which rely on visible, accessible, at-grade car parking for visitors.
- The Policy Guidelines require further refinement and are considered to be unnecessarily prescriptive for a local planning policy. They are on the one hand, blind to the requirements of smaller activity centres (being different to those of larger centres) and on the other, setting many unachievable outcomes for the smaller centres if literally interpreted for the purposes of permit application assessments. It is suggested that expert urban design input be sought to assist the further refinement of these guidelines, with clarification of which guidelines are general or relate to specific types of centres based on size and function within the hierarchy.

5.0 CONCLUSIONS

For the reasons set out above, our client submits that the Amendment, as it relates to Berwick Springs' future designation as a Medium NACs and the conjoining of Eden Rise with Berwick Springs to be an 'Aspirational MAC', is poorly conceived and lacks strategic planning merit and justification. Furthermore, the economic data used to justify these outcomes is outdated and inadequate having regard to the existing and approved activity centre development in proximity to the Eden Rise and Berwick Springs.

Our client welcomes the opportunity to meet with Council officers to discuss the proposed amendment, as well as to discuss the progress of the Berwick Springs planning review.

Please contact this office on 8648 3500 should have any queries regarding the details of this letter.

Yours sincerely,

[Redacted Signature]

[Redacted Name]

Senior Associate

[Redacted Address]

cc: Charbury Pty Ltd

23 December 2019

Strategic Projects Planner
City of Casey

By way of online portal:

https://conversations.casey.vic.gov.au/ACS/survey_tools/submission

Dear Sir / Madam,

**CITY OF CASEY ACTIVITY CENTRES STRATEGY UPDATE – AMENDMENT C258
1-9 REGENCY DRIVE, NARRE WARREN
340 EVANS ROAD, LYNDHURST**

We act for Kaufland Australia Pty Ltd (**Kaufland**) in this matter.

We write to express our client's interest in Council's work to date in developing and preparing the Activity Centres Strategy for the City of Casey and the proposed Amendment C258.

We also write to participate in the Amendment C258 Panel hearing, which has expected hearing dates commencing 13 April 2020. We request the Council as the planning authority refer this submission to the Panel appointed pursuant to section 22(2) of the *Planning and Environment Act 1987 (the Act)*.

By way of background, Kaufland is planning on entering the Victorian market by establishing a quantum of stores across metropolitan Melbourne and regional areas to establish a sufficient market presence and to provide a major new retail offering for Victorians, including significant associated net community benefit.

To date, preliminary planning has identified potential opportunities for Kaufland to establish supermarkets in the City of Casey. This includes:

- The site at 1-9 Regency Drive, Narre Warren, located within the Fountain Gate-Narre Warren Metropolitan Activity Centre; and
- A portion of the land at 340 Evans Road, Lyndhurst (the south-west corner of the Site), located within the Business Activity Centre of the Cranbourne West PSP area.

Relevantly, we note that the City of Casey Activity Centres Strategy:

- Identifies the Business Activity Centre as being a proposed Medium Neighbourhood Activity Centre (Merinda Park), which has Characteristics and a Function to – inter alia – provide a “strong focus on supermarkets, with a mix of full-line and small format supermarkets...”;
- Nominates the Fountain Gate-Narre Warren as a Metropolitan Activity Centre (MAC), which has Characteristics and a Function to – inter alia – provide a “strong focus on supermarkets of various sizes”;
- Identifies the need for more supermarket floorspace to be planned for the municipality;
- Promotes employment generation and diversification through the provision of non-retail employment opportunities within a MAC;
- Targets 40% non-retail floorspace to be provided in a MAC and 25% non-retail floor area to be provided within Medium Neighbourhood Activity Centres;
- Encourages development over 1,000sqm to be at least 3 storeys in height in a MAC and 2 storeys in Medium Neighbourhood Activity Centres; and

- Provides urban design and built form guidance for new developments within Activity Centres.

The proposed new clause 22.01 Activity Centres Policy seeks to:

- Discourage the development of supermarkets where they are not part of an integrated component of the activity centre with other retail or commercial development.
- Encourage the early establishment of anchor uses, such as supermarkets or office buildings;
- Encourage a greater amount of commercial office space to cater for non-retail jobs in activity centres.

Although there is clear encouragement under Amendment C258 for new supermarket floorspace to be accommodated within the City of Casey's network of Activity Centres, this ambition is somewhat undermined by the direction to encourage a high level of non-retail floorspace and employment to be provided within Activity Centres. In addition, the urban design, height and built form guidelines are somewhat rigid, and could potentially preclude or discourage catalyst developments, such as the Kaufland supermarket, from locating on key sites within key Activity Centres.

The introduction of a Kaufland supermarket within the Fountain Gate-Narre Warren Metropolitan Activity Centre and Merinda Park Medium Neighbourhood Centre would provide a significant net community benefit and will deliver upon the broader objectives sought under Amendment C258, such as:

- The delivery of significant employment opportunities within the City of Casey;
- The vision to create a network of 20 minute neighbourhoods;
- Contributing to the vitality of activity centres; and
- The delivery of land use / development that will support the on-going economic viability of an activity centre.

It is noted that the Kaufland 'model' requires significantly larger sites than that required for a conventional supermarket, which limits Kaufland's ability to locate in established activity centres where land availability is often scarce. These perceived spatial and locational limitations dictate that Kaufland consider locations where large supermarkets offerings may not have been contemplated by policy. Nevertheless, existing policy considerations should be balanced against the significant potential benefits associated with the introduction of new retailers (i.e. Kaufland) to the local market. Such benefits include new and significant investment, additional employment opportunities, increased consumer choice, downward pressure on grocery prices, and the delivery of anchor stores to centres, thereby improving the overall level of activity.

It is on this basis that we say the City of Casey Activity Centres Strategy and clause 22.01 Activity Centres Policy should be more flexible and adaptive in ensuring complementary new retail formats, such as a Kaufland supermarket, are not discouraged or precluded by the desire for non-retail employment generating uses and specific urban design, height and built form outcomes.

Please note that this submission is not exhaustive. Together with Kaufland we look forward to the opportunity to work with Council on this important initiative and anticipate expanding on this submission, including at any independent panel assembled.

Please do not hesitate to contact the undersigned or [REDACTED] on [REDACTED] should have any questions.

[REDACTED]
[REDACTED]

[REDACTED]
PLANNING & PROPERTY PARTNERS PTY LTD

[REDACTED]
Acting Team Leader - Strategic Planning and Reform
City of Casey
PO Box 1000
NARRE WARREN VIC 3805

23 December 2019

[REDACTED]

NOTICE OF AMENDMENT:	CITY OF CASEY C258
VICROADS REFERENCE NO:	FILEIT - 17066861
PROPERTY ADDRESS:	ACTIVITY CENTRES STRATEGY

I refer to the above matter recently received at this office.

VicRoads (now part of the Department of Transport – DOT), understands the purpose of the proposed amendment will be to implement the City of Casey Activity Centre Strategy 2019, by amending Clause 21.05 Economic Development, replacing the Retail Policy at Clause 22.01 of the Casey Planning Scheme.

It is further understood the Strategy sets out Council's vision for activity centres and how the vision will be achieved, by implementing necessary changes to Casey's Planning Scheme to support Council to implement the strategy.

VicRoads strongly recommends that due consideration is given to the *Movement & Place Framework* when formulating the Activity Centre Strategy.

Should Council wish to progress this discussion or have any further matters requiring clarification on this matter, please contact [REDACTED] on telephone number [REDACTED] on [REDACTED]

Yours sincerely

[REDACTED]

[REDACTED]
SENIOR STATAUTORY REFERRAL OFFICER

23/12/2019

EPA Reference: 5010127

██████████
Casey City Council
2 PATRICK NORTHEAST DRIVE,
NARRE WARREN, VIC, 3805

██████████
RE: C258 CASEY ACTIVITY CENTRES STRATEGY

Thank you for your correspondence in relation to the above strategic planning matter, referred to EPA on 17/10/2019.

The amendment proposes to implement the City of Casey Activity Centre Strategy 2019.

EPA has reviewed the proposal as outlined and referred via email. In the current form, the proposal does pose a risk to the environment or human health, and therefore EPA will not be providing further response.

If our assessment is not aligned with your view of the environmental risk, or if the proposal is amended, please contact EPA Planning on 1300 EPA VIC (1300 372 842), or at stratplan@epa.vic.gov.au.

Yours sincerely,

██████████
Land Use Planning Delivery Team Leader
Major Projects and Planning Unit
EPA Victoria



**Environment
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24 December 2019

██████████
Senior Projects Planner
City of Casey
PO Box 1000
NARRE WARREN, Victoria, 3805

Submitted by email: planningscheme@casey.vic.gov.au

██████████

**Planning Scheme Amendment C258 to the Casey Planning Scheme
City of Casey Activity Centre Strategy 2019**

We refer to the above Planning Scheme Amendment currently on public exhibition.

This submission is made on behalf of existing Woolworths assets (both as a landowner and tenant) throughout the City of Casey. Currently there are 12 Woolworths supermarkets operating within existing Activity Centres in Casey, with the Cranbourne West (Corner of Hall & Evans Rd) supermarket currently under construction and due to open in June 2020.

Woolworths have had an active engagement with strategic planning in the City of Casey for many years and endorse Council's ongoing commitment to support the economic viability of Activity Centres and meet needs of the local community. Overall, Woolworths supports the intent of the proposed Amendment to review the existing policy. The purpose of this submission, however, is to assist Council's understanding of the viability and performance of current and proposed Activity Centres.

Significant population growth has occurred in Casey since 2010 when a number of the current developed Precinct Structure Plans (PSP's) were commenced and approved. Residential catchments within many existing PSP's are now largely developed and population established. The review of the Activity Centre Strategy (in 2006 & 2012) now provides the opportunity to analyse how strategic planning has performed based on real time population data and retail spending to support future growth and performance.

Unfortunately, from our review of the Amendment and the supporting documentation, there does not appear to be substantial analysis of current retail performance (note: the SGS appears to rely on 2011 & 2016 data). The Amendment appears to adopt assumed floor area requirements and translate to job growth, rather than analysing actual retail spending, population data assessed against previous forecasts (that formed the basis of current strategic policy) and performance capacity for planned growth.



By way of background, existing sales data from the 12 trading Woolworths supermarkets in Casey indicate that last financial year current capacity rates at all levels of Activity Centres underperformed. We provide the following examples, for your information:

- Casey Central (define as 'Sub Regional' under previous policy) is performing at 73% of anticipated sales and about 50% of total capacity that it could achieve longer term.
- Cranbourne East (Hunt Club) (Large NAC) is performing at 133% of anticipated sales, however only about 66% of total capacity that it could achieve longer term.
- Marriott Waters (Large NAC) is performing at 59% of anticipated sales and about 60% of total capacity that it could achieve longer term.
- Selandra Rise (Medium NAC) is performing at 58% of anticipated sales and about 33% of total capacity that it could achieve longer term.
- The Avenue (Medium NAC) is performing at 67% of anticipated sales and about 50% of total capacity that it could achieve longer term

Trading catchment areas for each of the above Centres have reached or are near reaching capacity in terms of anticipated household numbers. The failure to meet supermarket trading capacity has a significant 'knock-on' to specialty retailers viability, leading to high vacancy rates, that is only further exacerbated where Activity Centre catchment areas overlap.

Woolworths believes there are a number of factors impacting trading capacity, in particular within Neighbourhood Activity Centres (NAC 's) in greenfield locations. The challenges include:

- The changing nature of household size, with resultant population catchment forecasts failing to meet expectation;
- Need for greater dwelling density in and around activity centres to make up shortfall of population catchments for planned Activity Centres;
- General over provision of land for retail/commercial floor space within in Activity Centres, which ultimately remains vacant and unviable for commercial development (in particular the short to medium term);
- Urban design and planning blockages that do not allow appropriate and economically viable staging of Activity Centres;
- Ongoing focus on 'main street' urban structure / design versus a need to ensure Activity Centre layouts and building structures enhance customer convenience and attract more customers.

The nature of retail is changing at a very fast pace. Convenience is critical. The ease of getting 'in and out' and ordering online will shape future Centres. All supermarkets moving forward will require drive thru pick up for online ordering, which will further erode the reliance on foot traffic to support speciality retailers and a main street focus of NAC's. Realistically, with new technology, we anticipate floorplates will only get smaller and the allocation of speciality floor area will need to be reduced to remain viable.

In our view a comprehensive review of up-to-date data in relation to existing retail spending, trade performance / capacity and the spatial allocation of land for all planned and future Activity Centres, should be undertaken as part of this Amendment.

In addition to the above, we provide the following comments more specifically in relation to the content of the Amendment, including:

- It is understood that the Amendment proposes a Activity Centre hierarchy to align with Plan Melbourne, which refers to 'Metropolitan Activity Centres' supported by a network of *'major and*

neighbourhood activity centres of varying size, role and function that can range in size and intensity of use from *'large shopping centres to small local strip-shopping centres'*. However, from our review the proposed Amendment does not appear to align with the Plan Melbourne categorisation. The proposed Casey Activity Centre hierarchy appears more to amend its existing definitions between 'Metropolitan', 'Major' Activity Centres and remove 'Large' NAC's, whilst retaining 'Medium' and 'Local' definitions.

It is considered that either the hierarchy and definitions should be better amended to directly align with Plan Melbourne, or the existing categorisations should be retained.

- It is unclear why some currently defined 'Large' NAC's are proposed to be redefined as 'Medium' NAC's, when the proposed floor area is greater and play a very different role to other centres that are being designated a 'Medium'. 'Medium' NAC's are defined in the Strategy as containing between 5,000sqm to 20,000sqm of floor space.

For example, Marriott Waters is defined as a 'Large' NAC's within the existing retail hierarchy. It is planned to contain over 36,000sqm of floor space and will be at capacity in 2036, according to the SGS report. Under the proposed revised Amendment, Marriott Waters is proposed to be re-designated as 'Medium'.

In contrast the future NAC (referred as Centralparkway in the Strategy) located between Marriott Waters and Cranbourne West, is proposed to be developed for up to 5,000sqm of floor area (according to the Strategy) and is also designated as 'Medium', yet clearly will play a very different role in the overall hierarchy.

Woolworths have assets in each Centre, however, are concerned that the roles and catchments have not been adequately or realistically considered. The catchment to support a Centre at either end of the scale and the role they play within the community is very different and measured to ensure viability.

The SGS report states 'Marriott Waters and Cranbourne West (cnr Hall Road and Evans Road) have both been designated as neighbourhood activity centres (medium). The floorspace proposed for these centres is constrained in size and the catchment is limited, with Cranbourne absorbing the higher order retail within this corridor. As such, these two centres fit within the medium classification'.

Marriott Waters (and Cranbourne West) is to be 'downgraded' to 'Medium', due to the above constraints. However, Centralparkway, located between, has even more limited catchment (including by virtue of being surrounded 'industrial land') and is even more spatially constrained. Yet it is also to be designated as a 'Medium' NAC.

Using this as an example, NAC's like Centralparkway should be reconsidered and categorised differently under the proposed hierarchy. Alternatively, the terms 'Medium' and 'Local' should be removed altogether.

- The Strategy does not appear to take into consideration the trading performance of the existing Activity Centres and relies on estimations of 'potential floorspace capacity'. As identified earlier, all supermarkets are currently underperforming and operating at substantially less than the anticipated 'viable performance capacity'. Whilst it is acknowledged that population within greenfield locations will continue to grow, the size of the Activity Centres should be

reconsidered with current trading data taking into consideration economic performance and capacity. Further target employment numbers in each Activity Centre will not be achieved unless overall capacity and economic performance of retailers is achieved.

- The proposition of an 'existing and aspirational' roles of Activity Centre referred in the Strategy is flawed and does not align with State Planning Policy. It is considered that Activity Centres should align with their proposed function and performance should be monitored within the short to medium term as development occurs. The definition may be adjusted accordingly to real data. There is an expectation that proper strategic and PSP planning review policy every 5 years to ensure it continues to align and represent relevant data and projections at that time.
- The urban design provisions of the Strategy do not take into consideration the changing nature of retail formats or 'shopfronts' given the implications of technology. The SGS report identifies that *'largely through the introduction of technology, the format of retailing will continue to evolve beyond a simple 'shop-front' which on-sells goods from a supplier'* and that greater retailing spending will continue to go on-line. The viability of the retail 'shop front' and main street design where foot traffic is reduced is a concern and requires further consideration within the Amendment.
- The proposed urban design guidelines fail to acknowledge the key design differences of Major Activity Centre and NAC's (including as proposed Medium and Local) and the ingredients that assist in achieving economically successful Centres.

While emphasis on pedestrian movement is important it must be balanced with suitable access to car parking and vehicle movements to ensure convenience. In particular the locations of main entrances and accessibility to car parking needs further consideration. The insistence to locate larger car parks to the *'rear, side and underneath buildings'* is not economically viable within smaller NAC's, particularly in greenfield area locations where cars are relied upon.

In our view, across metropolitan Melbourne the centres that are the most successful Centres (both supermarket and specialty stores) provide car parking in the front of the Centre. It is considered that Council should be more flexible in their approach to car parking design configuration to assist retail performance and encourage design layouts that may evolve over time subject to demand and overall centre performance.

- With reference to provisions for greater residential density in and around neighbourhood activity centres, urban design guidelines should acknowledge the adverse amenity implications of loading and refuse collection. It is important that the design and location of new housing recognise these interfaces and respond accordingly rather than the requirement be placed on the shopping centre existing use and operation.
- The proposed strategies to encourage other 'non-retail employment generating uses' in activity centres is supported, however floor spaces for such uses should only be provided if there is an identified need or tenant requirement. Speculative provision of non-residential floor space that is built as a requirement of planning approval or that cannot be appropriately staged is not economically viable, does not assist centre performance, nor does it generate jobs, if it remains vacant.

We trust the above comments and information is of assistance. We reserve the right to make further comment in relation to the Amendment.

WOOLWORTHS GROUP



Please contact the undersigned should you wish to discuss any of these matters further.

Yours sincerely,



Development Manager

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Fire & Emergency Management

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Submission 14

Our Ref: 8000-412131-94999

Telephone: 9262 8578

Council Ref: PSA00001/19.A, C258

8 January 2020

City Of Casey
P. O.Box 1000
NARRE WARREN VIC 3805

Dear Daniel

SUBMISSION TO PLANNING SCHEME AMENDMENT

Proposal: Amendment C258case

Planning Scheme: City of Casey

Thank you for the opportunity to provide comment on the above planning scheme amendment. CFA seeks to provide the following information for your further consideration:

CFA notes that the submitted Explanatory Report indicates that whilst bushfire has been considered and its acknowledged that one activity centre is located in a Bushfire Management Overlay it was considered that no bushfire risks would be created as a consequence of the updates to policy and the incorporation of *Council's City of Casey Activity Centre Strategy 2019*.

CFA encourages Council to consider whether the proposed policy updates and new strategy has contemplated bushfire risks to activity centres in bushfire prone areas and areas located nearby hazard vegetation or areas of future open space.

Also, where a bushfire risk has been identified, whether policy outcomes could be enhanced with the proposed strategy to support those sought under Clause 13.02-1s. For example, where the Activity Centre was located in the BMO, there may be some need for discussion around how Clause 13.02-1s will be able to be achieved where there is some inconsistency with the requirements in the BMO.

It is important to consider how new policy and strategies to be introduced into planning schemes can support bushfire outcomes sought by Clause 13.02-1S, even in situations where it is not as immediately clear how to apply them. There is an opportunity here to integrate good bushfire policy outcomes to provide some directions to future policy makers in the Activity Centres that have some form of current or anticipated bushfire risk.

CFA acknowledges that the risks in these areas are likely to be at the lower end and will be influenced from localised conditions rather than at a landscape scale. CFA is not seeking



Fire Safety Referrals

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extensive bushfire reports to be developed, rather recognition of any bushfire risks and the inclusion of information to help decision makers reduce or manage these localised risks.

If you wish to discuss this matter in more detail, please do not hesitate to contact [REDACTED]

[REDACTED]

Yours sincerely

[REDACTED]

[REDACTED]

Land Use Planning Team Manager
Fire & Emergency Management

██████████
Senior Strategic Planner
City of Casey
Po Box 1000
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Our Ref: 16370P

23rd March 2020

By email:

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caseycc@casey.vic.gov.au

Dear Bryan,

**RESPONSE TO OBJECTING SUBMISSION TO AMENDMENT C258 TO THE CASEY PLANNING SCHEME
BERWICK SPRINGS / EDEN RISE TOWN CENTRE**

We refer to the above matter and act on behalf of the owners and applicant of the development at Berwick Springs at 205 Michelle Drive, Berwick, Kameel Pty Ltd, and provide our response to the objection lodged by SJB Planning dated 23 December 2019, who were acting on behalf of Charbury Proprietary Limited, the owner and applicant of Eden Rise Shopping Centre.

Our clients support the Planning Scheme Amendment C258 as it currently stands. We have identified the principle objections made by the applicant and have provided the following response:

Response to key objections raised by Applicant

1. Suitability of Berwick Springs Site as a town centre

As the objection highlighted, Clause 22.01 notes that the majority of trips in the area are made by private vehicles. Furthermore, Casey is one the largest expanding Councils in Metropolitan Melbourne in terms of population growth and development (Clause 21.01-1, Casey Planning Scheme). The Berwick Springs site is located along two major roads and has existing car parking with the capacity for the retail and commercial functions to be expanded and the car parking to be increased to meet this demand. Furthermore, the site is in close proximity to residential areas with the provision of public transport nearby. As the site is well-located, is in close proximity to public transport and has the ability for significant expansion, it is our opinion that the site is suitable to accommodate a Medium Neighbourhood Town Centre and become joined with Eden Rise Town Centre to become an Aspiring Major Activity Centre.

At present, the strategic documents relating to the town centre site at Berwick Springs are outdated and in need of review. We acknowledge in the *Retail and Other Employment Floorspace Assessment* that the zoning is out of date for the now serving purpose of the area of Berwick Springs. Therefore, the implementation of the Activities Strategy and PSA will enable this area to sustainably grow as a commercial and retail hub.

2. Joining of Eden Rise and Berwick Springs into Aspiration MAC

Plan Melbourne defines Major Activity Centres (MACs) as places that provide 'services, employment, housing, public transport and social interaction which have different attributes and provide different functions' to the community. Although there are retail premises located on the Berwick Springs site,

there is also a significant amount of non-retail uses. Therefore, the joining of Berwick Springs with Eden Rise will not take away from Eden Rise Town Centre, but rather provide support and encourage diversified growth to the area.

It is our opinion that the Planning Scheme Amendment supports Clause 21.10, as the joining of the two sites will strengthen activity around the intersection of Greaves Road/O'Shea Road and Clyde Road which is identified as a key node for the area in the local planning policy. The two centres will complement each other to create a robust precinct that will support the needs of the rapidly expanding population of the area.

Another key concern that was raised in the applicant's letter was that the proposed PSA has significantly changed the activity centre hierarchy with little strategic justification which will result in development of an ad-hoc manner. However, the amendment has been supported and informed by a comprehensive economic assessment as well as both state and local planning policies as outlined above. Nonetheless, the draft Activities Centre Strategy has noted that further investigation will be undertaken to ensure that the merging of the two centres will occur in a sustainable, and well-planned manner that is justified and driven by the Planning Scheme. Our client is committed to working with the council to achieve these outcomes to create a shopping centre precinct that will thrive and prosper well into the future.

Other Matters

Council recently informed our client of a Section 72 Planning Permit Amendment at the Eden Rise Shopping Centre which we understand includes:

- The Aldi in the south of the centre to move to the north of the site (adjoining O'Shea Road) where there is currently some car parking at ground level. The store is proposed to be around 1600sqm. The car parking here will be located under the proposed Aldi as an undercroft/basement.
- The current Aldi in the south will be expanded into a 'large supermarket' and liquor store. The offices/medical centre fronting Cresthaven Boulevard will remain.
- The front of the centre will be expanded westwards encroaching into the car park with speciality shops being provided directly onto the street with an internal mall in front of Coles.
- The speciality shops/retail in the north will be relocated to the front of the store to allow the Aldi to move in there.
- The new 'large supermarket' is slightly smaller than the existing Coles and has been tentatively shown on indicative signage as being a 'Woolworths' supermarket.

We were able to view the plans for the proposed development at Eden Rise at Council's offices and were verbally informed that when Council received the response to the Request for Further Information the application was to proceed to notification. We have since been informed that as the site is subject to Development Plan Overlay – Schedule 1, and provided the proposal is generally in accordance with the adopted Development Plan it is exempt from notice and appeal and as such are not advertised.

Given the scope of the changes to the site submitted as part of the Section 72 planning permit application, we are of the view that it could be considered a transformation of the proposal and therefore warrant re-endorsement under the DPO as well as the s.72 amendment, which should without a doubt include formal advertising as it should not be considered "generally in accordance".

While we respect that this Section 72 Amendment issue is not technically forming part the Planning Scheme Amendment C258, we consider that Council permitting such a major development of the Eden Rise Shopping Centre, will only seek to undermine any potential for the combined success of the Aspiring Major comprising both Berwick Springs and Eden Rise. Allowing such intensive development on Eden Rise will dilute the need for retail and commercial uses on the Berwick Springs site, where a Woolworths supermarket is already planned, thereby compromising the designation as a combined Aspiring Major.

On this basis, we implore the Planning Panel and Council to take a fair and reasonable approach and refuse the Section 72 planning permit amendment for Eden Rise shopping centre, to support the vitality of the future development of Berwick Springs and allow it to become a viable shopping precinct.

It is considered that the combined centres will have bring significant benefit to the community and meet the growing demands of the population. We hope that the Council and Planning Panels Victoria give our client's comments due consideration in regard to the SJB Planning response and we look forward to hearing from you soon as to the outcome of the proposed amendment.

Should you have any queries or wish to discuss the above, please do not hesitate to contact myself or [REDACTED]

Yours faithfully
REEDS CONSULTING PTY LTD

[REDACTED]
Associate Director

cc Kameel Pty Ltd