

Sub	Issue #	Issue	Officer Response	Position to present to panel
1	1	Request clause 21.24 be updated to show land in Golf Links Road that has been rezoned for residential development as recommended by the panel for C198.	This change has been made as part of C198, and should be reflected in the final C258 documentation. It was not included in the exhibited amendment as C198 had not been gazetted at the time. This will be brought to the attention of the panel seeking an appropriate recommendation to make this change.	Request has been satisfied through C198 Gazettal. The C258 panel will be requested to recommend that C258 be amended to be consistent with C198.
	2	Request land be designated as medium density, as recommended by C198 panel, due to proximity to proposed Berwick Waterways Activity centre.	This change has been made as part of C198, and will be included in the final C258 documentation. It was not included in the exhibited amendment as C198 had not been gazetted at the time.	Request has been satisfied through C198 Gazettal. The C258 panel will be requested to recommend that C258 be amended to be consistent with C198.
	3	Update Strategic Framework Plan at clause 21.02-6 to correctly reflect the future Berwick Waterways Neighbourhood Centre.	Agree. This was omitted in error, and should be included.	Show the future Berwick Waterways Neighbourhood AC on plan at clause 21.02-6.
	4	Berwick Southern area map (at clause 21.10) has not been updated to reference the approval of the Berwick Waterways PSP.	Agree, this is an error that resulted from version control of the maps. The reference to 'Prepare a PSP for Berwick Waterways' has been deleted from the scheme, and should not be shown on this map.	Remove the reference to preparing a PSP for Berwick Waterways.
2	Nil	No objection, have requested no further contact.		No changes requested.
3	1	Draft strategy claims it will promote urban development that is economically, socially and environmentally responsible. Casey has less than 7% of native vegetation left across the municipality. The Activity Centre Strategy has ignored the fragility and capacity of the natural environment to sustain continuous urban expansion. The draft Activity Centre Strategy and amendment needs to be re-written 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 the future.	The draft activity centre strategy and amendment clauses have been written specifically around development of and in activity centres. Whilst the strategy acknowledges the benefits of trees and landscaping and revegetation of activity centres from an amenity perspective, it is silent on whether they are native or exotic species. Officers believe the Activity Centres Strategy addresses all issues it should, and that all land related issues are then addressed in the Casey Planning Scheme, and weighed up at planning permit assessment time.	No changes are recommended. The planning scheme is the appropriate tool to weigh up urban development and vegetation clearance.
4	1	Commend Casey on preparation of the strategy, particularly ensuring land is set aside for employment to provide local jobs for current and future residents. Support goal of non-retail floorspace targets in Activity Centres to increase other types of non-retail employment.	No action required.	No changes are requested.

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	2	Would like to understand and explore the impact of the proposed aspirational major activity centre, specifically relating to economic assessment, floorspace, population and feasibility with the nearby catchment.	There are two activity centres identified as aspiring to have their classification revised under Plan Melbourne. These are Eden Rise/Berwick Springs (combined into one Major centre), and Cranbourne Town Centre (reclassified from a Major to a Metropolitan Centre). This is due to projected floorspace demand. Further information and the background underpinning this has been provided to Cardinia officers.	No changes proposed.  Separate information has been provided to Cardinia officers as requested.
5	1	Seeks provision of safe places for homeless and marginalised. The submitter supports the centralisation of services into accessible local places that the Activity Centre Strategy seeks to achieve.	Many of the issues raised are operational issues, to be addressed through public space design, and facility operation rather than planning scheme controls.	No changes are proposed to the strategy or amendment.
	2	Shelter during the day in public areas.	Design guidelines for the amendment seek to better design public spaces in activity centres, in particular welcoming places such as town squares for people to congregate. Shelter/shade is also sought along footpaths/shopfront. The strategy seeks to locate community facilities such as community centres in activity centres, which add to shelter.	No changes are proposed to the strategy or amendment.
	3	Social housing	The strategy (along with Council's Housing Strategy) seeks to locate more and denser housing in and around activity centres. This strategy is silent on the ownership model of this housing, and there is minimal scope to address the ownership model through this strategy.	No changes are proposed to the strategy or amendment.
	4	Toilets open during the day and evening.	The submitter raised this regarding a specific issue in Cranbourne where the public toilets are closed at 5:00, and meal services for marginalised community members operate from an adjoining site from 6:00pm. The action plan recommends creation of a public toilet strategy (looking at provision and opening hours) as a medium term action (target date 18 months to 5 years).	No changes are proposed to the strategy or amendment.
	5	Good lighting.	The strategy includes design guidelines around lighting, including: - Ensure lighting supports night-time social and recreational activity, amenity and safety in the public realm. - Locate lighting for safe travel and way-finding along pedestrian and bicycle paths.....	The strategy and amendment are consistent with this request, and no changes are required.
	6	Access to public transport.	A key underpinning theme throughout the strategy is encouraging public transport use to and from activity centres (reducing congestion), and ensure they are accessible to all people.	The strategy and amendment are consistent with this request, and no changes are required.
	7	Storage areas for belongings to be left for a few hours.	This falls outside the scope of the broader objectives of the strategy, and is more an operational issue. Council may wish to investigate installing lockers (or similar storage facilities) in public spaces as part of a separate project, but it is outside the scope of the activity centre strategy.	No changes are proposed to the strategy or amendment.

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	8	Security/police availability.	Police availability is an operational issue, with demand generally prioritised based on risk. Security and police provision are outside the scope of the Activity Centre Strategy, however the strategy design guidelines reference CPTED (Crime Prevention Through Environmental Design) which seeks to improve safety through design.	No changes are proposed to the strategy or amendment.
	9	Lack of affordability at cafes for marginalised and impoverished people. Other opportunities for social inclusion and gathering.	The Activity Centre Strategy seeks to direct Council investment for community facilities to activity centres, and to provide public outdoor spaces. This will not apply in all activity centres (particularly those smaller ones), but does provide opportunities for community members to gather without spending money. Most new community facilities have a lounge area for casual use by the community.	The strategy and amendment are consistent with this request, and no changes are required.
6	1	Minimum building heights - Propose to reword building heights to only apply to new buildings, and to be at least two to three storeys, where practicable.	The suggested change would substantially reduce the effectiveness of the proposed policy. Fountain Gate is a Metropolitan Activity Centre, and Council should be seeking intensification on all new development, including extensions consistent with Plan Melbourne.	No changes are proposed to the strategy or amendment.
	2	Delete policy guideline requiring all development over 1000m2 to provide non-retail floorspace.	A key objective of the Strategy is to diversify the activity centres, so the blanket removal of this requirement is not supported. However, specific structure planning has been undertaken for Fountain Gate-Narre Warren Activity Centre to plan specific land uses around precincts, which should ensure diversified land uses. Provided development is consistent with the Structure Plan, this requirement should not apply to Fountain Gate-Narre Warren.	Revise the exemption (at the bottom of the table to clause 21.01-5) beyond the current PSP only to include any land in a UGZ, CDZ or ACZ.
7	1	Objects to 760 South Gippsland Highway Lynbrook not being designated as any form of commercial precinct. Believes this contradictory to Lynbrook and Lyndhurst Development Plan. Land is currently in the General Residential Zone, but within 500m buffer of landfill.	There has not been any floorspace analysis or review to support the inclusion of this site as an Activity Centre. The Lynbrook and Lyndhurst Development Plan identifies this land as commercial, but not as an activity centre (which are identified separately). Should the land-owner seek to rezone this land, separate investigations will need to be undertaken into the appropriate land uses and therefore zone.	No changes are proposed to the strategy or amendment.
	2	EPA not supportive of any sensitive use.	This is a permit related issue, and requires resolution between the EPA, Council and the applicant.	No changes are proposed to the strategy or amendment.
	3	Omission of the site from the strategy will hinder rezoning.	Assessment of suitability to designate the site as an activity centre has not been undertaken. The site is located on the South Gippsland Highway between two identified centres (one existing, one proposed) approximately 1.6km apart, and will not address a walkability gap. Based on an initial review of the criteria to designate a new centre, designation of a new activity centre is unlikely.	No changes are proposed to the strategy or amendment.
	4	Inclusion of policy objective 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 EPA's position.	The inclusion of the policy objective will further assist applicants for non-sensitive uses in the residential zone where they are in a buffer for an offensive industry, by supporting non-residential uses in these areas.	No changes are proposed to the strategy or amendment.

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	5	EPA's definition of non-sensitive land uses is not clear, and it is evident EPA have been opposed to applications for convenience restaurant and medical centre.	Sensitive uses are defined in the Practice Note for Potentially Contaminated Land as child care centre, pre-school, primary school, residential buildings and dwellings. Convenience restaurants and medical centres are not defined as sensitive uses in the planning system.	No changes are proposed to the strategy or amendment.
	6	Given the constraints on 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.	The Activity Centres Strategy only identifies activity centres, not other commercial land (such as stand alone commercial land like office parks, car dealerships, and convenience stores). A detailed assessment has not been undertaken of the suitability for this land as an activity centre, as such identification as any sort of precinct in the Activity Centres Strategy would be premature.	No changes are proposed to the strategy or amendment.
8	1	Overall supportive of the amendment, in particular reinforcing the role and function of activity centres. Seek some minor changes.	Nil	No changes requested.
	2	Note an increase in out of centre development. It is important that local policies provide a robust framework for out of centre proposals to be discourage where they will undermine the activity centre hierarchy. Commercial 2 Zone appears far less regulated than similarly sized commercial development in a residential zone. Seek strengthening of Hierarchy objectives, and the Out of Centre location assessment.	No specific changes to strengthen the hierarchy objectives or out of centre location assessment have been requested. Officers have worked through these criteria with officers from DELWP to arrive at the current proposed wording. Officers are happy to consider any recommended changes to the wording which strengthen the intent of the policy. But to date none have been put forward.	Support current proposals, but consider any recommended changes put in submissions to the panel by the submitter to enhance the amendment.
	3	Strategy (and policy) seek to encourage non-retail floorspace (of 30/40%) and minimum building heights (2 to 3 storeys) in Major and Metropolitan centres. Concerns as to how this may play out for locations that are traditionally retail focussed and how this will be interpreted on an individual application basis.	A key objective of the Strategy is to diversify the activity centres, so blanket removal of the non-retail use policy is not supported. Specific structure planning has been undertaken for Cranbourne Major Activity Centre to plan specific land uses around precincts, which should ensure diversified land uses. Provided development is consistent with the Structure Plan, this requirement for a minimum non retail floor space should not apply to this centre. In relation to building heights, a change to the policy to encourage buildings to be at least two to three storeys is not supported by officers. It is included in a local policy and is not mandatory.	Revise the exemption (at the bottom of the table to clause 21.01-5) beyond the current PSP only to include any land in a UGZ, CDZ or ACZ.
	4	Strategy expresses the desire for new non-residential floorspace to be adaptable as it is impractical. They seek further thought into this, and give the example of adapting a supermarket for office space is challenging.	The key objective is to ensure vacant spaces can be re-used, and do not remain vacant therefore undermining the centre.	It is not proposed to recommend any changes on account of this submission. The policy is clear in its drafting.

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	5	Recommend that the requirement for at least 25% of lettable floorspace of new developments to be provided for non-retail uses be assessed on a case by case basis.	A key objective of the Strategy is to diversify the activity centres so reducing the application of this provision is not supported. The provision requiring non-retail development in new development is included in local policy, so has some discretion for consideration on a case by case basis. However it is proposed to clarify that where development is in an ACZ, CDZ or UGZ, that this provision will not apply to individual developments, as the land use mix will have been addressed at initial planning stage.	Revise the exemption (at the bottom of this table) beyond the current PSP only to include any land in a UGZ, CDZ or ACZ.
	6	The annotation of 'Cranbourne Town Centre' on the Regional Context Map (clause 21.01) should be changed to 'Cranbourne Major Activity Centre'.	Agree. This was overlooked when preparing the amendment for exhibition. This names of Fountain Gate Narre Warren and Berwick Village should also be changed. This will be recommended to the panel.	Amend names of all three activity centre plans to be consistent with Plan Melbourne.
	7	Question the need for out of centre proposals in a retail environment that is still growing, particularly given the investment (to date and future) that is made into the centres.	The strategy directs development to centres, but recognises that there are some circumstances that out of centre development may be supported. The policy supports this and provides guidance on the assessment of permit applications.	No changes are proposed to the strategy or amendment.
	8	Wording around role and function of Restricted Retail Precincts could be revised to be stronger. Council should also consider a more explicit comment that whilst small supermarkets are permissible, in relation to larger supermarkets, unless nominated as a shop based activity centre, such a proposal is not consistent with policy.	No specific wording has been proposed to consider. Officers believe the current proposed policy when combined with state policy is clear that retail development and uses outside of activity centres will not be supported, unless they are ancillary to service the primary use on site.	Support current proposals, but consider minor changes which enhance the amendment.
	9	Requests revising the fifth objective of 21.15-2 (proposed text underlined): To ensure that the Cranbourne Major Activity Centre can maintain its present role and <u>aspiration to become a Metropolitan Centre whilst serving the additional significant residential growth forecast for the area.</u>	An early draft of the strategy was provided to DELWP who advised that they would not support the aspirational approach in the amendment at all, or on maps in the strategy. DELWP did not have an objection to Council noting the aspirational approach in the strategy. The exhibited strategy and amendment are consistent with this.	No changes are proposed to the strategy or amendment.
	10	Strongly supports the discouragement of development of supermarkets where not part of an integrated component of activity centres.	This is strategy identified in the Activity Centres Strategy and has been carried forward into the policy.	No changes requested.
	11	Action Plan includes implementation of 2018 Cranbourne Structure Plan. Look forward to working with Council on implementation.	Nil	No changes requested.
9	1	Proposal to nominate Berwick Springs commercial land as a Future Neighbourhood Activity Centre is lacking in strategic planning and land use economics justification and should be abandoned. Note that Eden Rise has consistently had retail vacancies, increasing in more recent times, demonstrating that supply is already outstripping demand.	The local population and catchment is growing, supporting an increase in floorspace, and reducing vacancies. It should be noted that shop vacancies are not necessarily a direct indicator of over-supply. While oversupply is a possible reason for vacancies, other possible reasons include the rental expectations not meeting the market, or other issues such as perceptions of the centre.	No changes are proposed to the strategy or amendment.

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	2	Amendment should delete all references to the Berwick Springs Medium NAC.	The designation of Berwick Springs as an Activity Centre is supported by background research that Council has undertaken.	No changes are proposed to the strategy or amendment.
	3	Proposal to elevate Eden Rise and Berwick Springs as an Aspiring Major Activity Centre is lacking in strategic planning and land use economics justification and should be abandoned.	Disagree. The elevation is supported by the SGS report and economic assessment.	No changes are proposed to the strategy or amendment.
	4	There is no potential to integrate the two landholdings.	Full integration of landholdings may not be possible, but there are many benefits of co-location, and there are opportunities to improve connectivity between the two centres (such as improved pedestrian crossings). Other benefits include reducing congestion and travel times, as well as providing greater public transport opportunities for accessibility, and the like.	No changes are proposed to the strategy or amendment.
	5	The SGS Economic Assessment and background report omits Minta Farm Medium Neighbourhood Centre.	Minta Farm Medium Neighbourhood Centre was not included in the background report. This may have been due to timing of the PSP and the background report. This will be further interrogated at panel, particularly through expert evidence.	No changes are proposed to the strategy or amendment.
	6	The SGS background report assumes that real capital spending will increase at 1.4% per annum between 2016 and 2036. The submitter considers this to be too high, and 0.5% would be more appropriate.	The submitter has not provided any justification to support their assessment of the expenditure growth being too high, or to support reducing it. This matter is likely to be addressed more thoroughly by economic experts at the panel hearing.	Retain the 1.4% per capita expenditure growth rate, unless panel recommends an alternative decision.
	7	Majority of trips are made by cars. All activity centres in Casey rely on excellent vehicle access to be viable. Visible, safe, convenient and accessible car parking are critical factors for smaller centres.	It is acknowledged that most people access activity centres by car, and this is unlikely to change without policy intervention. A key objective of the strategy is to increase the number of people walking or riding to activity centres, particularly Neighbourhood Activity Centres.	No changes are proposed to the strategy or amendment.
	8	Clause 22.01-3 seeks to ' <i>discourage the development of supermarkets where they are not part of an integrated component of the activity centre with other retail or commercial development.</i> ' The identification of Berwick Springs as a Medium NAC would potentially allow for a supermarket in a location that is distant from and not integrated with Eden Rise Shopping Centre.	The designation of Berwick Springs as an Activity Centre could allow for development of a supermarket there. Integration of that supermarket with Eden Rise Activity Centre would be highly unlikely (particularly given the topography and site layout of Eden Rise), however policy would require the supermarket to be part of an integrated component of the Berwick Springs Activity Centre including its other retail or commercial development.	No changes are proposed to the strategy or amendment.

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	9	<p>Clause 22.01-3, 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'.</p> <p>Eden Rise has the potential to accommodate substantial growth, and as an integrated centre, will maximise opportunities for social interaction and safe pedestrian movement. Expansion to include the Berwick Springs land, would detrimentally diminish these opportunities.</p>	<p>Officers do not accept that expansion of commercial development on Berwick Springs land will substantially diminish opportunities for Eden Rise to accommodate substantial growth.</p> <p>The strategy seeks a diversification of land uses, further expanding the catchment.</p>	No changes are proposed to the strategy or amendment.
	10	<p>Clause 22.01-4 (Out of Centre development) seeks to ensure out of centre development does not compromise the activity centre network. Currently Berwick Springs is identified as a 'mixed use area complementary to the Eden Rise Neighbourhood Activity Centre'. It is an out of centre development by definition and 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.</p>	<p>The Activity Centres Strategy 2019 (and the amendment) propose to designate Berwick Springs as a Medium Neighbourhood Activity Centre. Should this occur, it will not be out of centre development.</p> <p>Council has already considered a request to rezone this land, and resolved to further consider the matter following adoption of the Activity Centre Strategy.</p>	No changes requested.
	11	<p>Questions why Council would even contemplate applications outside of activity centres (22.01-4) given they are contrary to policy. Such applications should be excluded from consideration.</p>	<p>Development applications outside of activity centres are permissible (where the zone allows), and Council must therefore consider them. Out of centre development can include office parks, medical clinics, convenience stores and other facilities. Council needs policy to guide assessment of these applications.</p>	No changes are proposed to the strategy or amendment.
	12	<p>Support Employment in Activity Centres (22.01-5) given the potential to assist the creation of '20 minute neighbourhoods' and reduce escape expenditure.</p>	<p>Noted. No changes required.</p>	No changes requested.
	13	<p>Support the Economic viability of activity centres policy (22.01-6), but question why Council has a specific policy to support 'mini-major' stores in Medium NAC's, particularly when floorspace may be relatively small.</p> <p>Reference to Medium NAC's should be deleted from this policy.</p>	<p>In general most shop uses will be as of right, and Council has no control over the brand of tenancy (only the 'type' where the use requires a permit) but this policy will support provision of some medium sized retail stores (say around 200-500m<sup>2</sup>) in centres with 5000-20,000m<sup>2</sup> of floorspace.</p>	No changes are proposed to the strategy or amendment.

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	14	Generally support Great places for people section of activity centres policy (22.01-7), but believe reference to providing car parking behind 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 objective of this policy is to avoid large expanses of car parking at the front of activity centres, dominating the appearance (even when softened by landscaping). Feedback from the development sector resulted in the strategy being reworded (to behind the facade) to allow parking to the side of buildings, and some in the front so it is clearly visible and accessible. While the wording of this strategy can be refined, officers do not support changing the intent.	No changes are proposed to the strategy or amendment.
	15	Seek further refinement of policy guidelines (22.01-7), and consider them too prescriptive for local policy. Blind to requirements of smaller activity centres, and set many unachievable outcomes for smaller centres if interpreted literally. Suggest urban design expertise to refine, and clarification of which are guidelines are general, and which relate to specific types of centres in the hierarchy.	These primarily relate to urban design guidelines, and officers believe they are appropriate for all activity centres, both small and large. Further these are policy guidelines that applications will be assessed against, and are not a 'must' requirement for all applications.	The intent of all guidelines should be retained, but if any anomalies in the wording become clear during the panel process, support changes to provide greater clarity.
10	1	Clear encouragement under Amendment C258 for new supermarket floorspace in Centres, this ambition is somewhat undermined by the direction to encourage a high level of non-retail floorspace and employment to be provided. 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.	Casey residents face significant transport congestion and travel times getting to and from work, with over 70% of workers leaving the area each day for employment. Generating more employment opportunities locally will assist to reduce travel times and congestion. The design guidelines seek to ensure out activity centres are better places for our residents, providing nicer places to spend time, and more reasons to visit.	No changes are proposed to the strategy or amendment.



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		<p>The Kaufland 'model' requires significantly larger sites than a traditional 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.</p>	<p>The strategy is essentially concerned with the planning of activity centres rather than the creation of stand alone outlets. The current Kaufland model (for Australia) relies predominantly on a stand alone model of a supermarket with a small number of associated shops such as liquor a cafe and other small provisions but without any real integration with other aspects of an activity centre. Their model relies on at high levels of grade car parking (occasionally undercroft), and a standalone building.</p> <p>To date four Kaufland stores have been approved, and one conditionally approved. All are located away from the core retail area of activity centres, meaning that while they draw significant levels of trade they do not act as an anchor for other retail and hospitality businesses.</p> <p>While the design requirements do require additional thought into the design process, and the requirement to integrate supermarkets into other development does require additional floorspace for those uses, these are not unreasonable requirements for large commercial development to deliver benefits to our community.</p> <p>Kaufland has a varying store model overseas, with a range of integrated supermarkets (with other retail outlets) and a range of alternate car parking options, such as underground, undercroft (sleeved by other retail), and above store. This does not appear to be being rolled out in Australia given that the planning process is through the exceptional site specific approach which more streamlined and avoids the scrutiny of both Council and VCAT.</p> <p>While the requirement to alter their store model (in terms of design and integration) may increase development costs, it will not preclude Kaufland from establishing, and ensure that other economic benefits and employment beyond the single business are generated.</p>	No changes are proposed to the strategy or amendment.
11	1	VicRoads strongly recommends that due consideration is given to the Movement & Place Framework when formulating the Activity Centre Strategy.	The Movement and Place Framework is a state-wide publication addressing network classifications, prioritisation and other transport matters. The Casey Activity Centres Strategy is consistent with this, in particular strategies S2.2, S3.2 and S4.2. The action plan also calls for access and movement planning in Casey's activity centres (actions 21 and 22).	The submission does not seek changes to the amendment.
12	Nil	The Amendment does not pose a risk to the environment or human health, therefore EPA does not provide further response.	Nil	The submission does not seek changes to the amendment.
13	1	Acknowledge active engagement with Council in the past, and support the intent of the proposed amendment.		No changes requested.

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	2	Limited analysis of retail performance. Amendment appears to adopt assumed floor area requirements, and translate to job growth, rather than analyse actual retail expenditure, population data, and performance capacity. A comprehensive review of up to date	While there are different ways of undertaking the assessment that is required for an activity centre strategy, the SGS report's methodology is appropriate given the size of the City of Casey. This methodology is also consistent with the methodology used b	No changes are proposed to the strategy or amendment.
	3	Provided 5 examples of stores in PSP's (1 Major AC, 4 Medium Neighbourhood). Of these, one is performing above anticipated sales, other four are well below, and all are well below longer-term capacity.	It is not unusual for the stores to perform below longer-term capacity. All are in growth areas that are not yet fully built out. No data has been provided for the remaining seven stores that are in established areas (although Woolworths did advise that all 12 stores underperformed).	No changes are proposed to the strategy or amendment.
	4	Trading catchments for each of the 5 centres listed are near or reaching capacity in terms of household numbers.	Aerial imagery of the relevant PSP areas indicate this is not the case. One of the catchments is near fully developed (this is the store trading well above anticipated volumes), but the remaining four are in areas which still have substantial catchment development capacity. One has only around 1/4 of land within 800 metres developed (some undeveloped land is earmarked for commercial development, and some requires the Croskell PSP to be prepared). The Activity Centres Strategy predicts demand out to 2036. Over time development will be intensified, in growth areas this may be the development of medium density sites.	No changes are proposed to the strategy or amendment.
	5	Changing household sizes are impacting on the trading capacity of Neighbourhood Activity Centres.	Household sizes are reducing throughout the state. Council's housing strategy seeks to promote housing diversity, and more dense housing around activity centres to assist in increasing catchment populations. The traditional model of development within Neighbourhood Activity Centres in growth areas generally does not provide for substantial housing provision within the commercial areas of the activity centre unlike activity centres in established parts of Melbourne. However, this is a matter for the developers of those activity centres. Certainly, there is significant policy encouragement for housing within and adjacent to activity centres. The seeking of additional non retail floor space in activity centres is an appropriate policy response not unlike the policy response that seeks housing within (as well as adjacent to) activity centres.	No changes are proposed to the strategy or amendment.
	6	There is a need for greater density around activity centres to offset the shortfall in population catchments for activity centres.	The Activity Centres Strategy and Casey Housing Strategy both seek increased density around existing and future activity centres. In general PSP's seek increased density around activity centres as well, however this is usually only in the immediate surrounds. The challenge is to increase density within 400 metres of centres, and substantially increase density (through apartments) within and adjoining activity centres.	No changes are proposed to the strategy or amendment.

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	7	Over provision of land for commercial and retail floorspace in activity centres which ultimately remains vacant and unviable for commercial development (particularly short to medium term).	A key outcome of the strategy is non-retail commercial floorspace, and retail floorspace to 2036. If this land is not set aside now, it will be developed for other uses and not be available for commercial development. An objective of the strategy is to encourage interim land uses to activate unused space in activity centres.	No changes are proposed to the strategy or amendment.
	8	Urban design and planning blockages that limit economically viable staging of centres.	The blockages occur where the outcomes that Council and developers are seeking vary. Staged developments can often take many years (even decades) between stages, and often poor outcomes that are intended to be temporary can be long-term. There are opportunities to work with developers to include other permit conditions to better facilitate staged development, ensuring that poor outcomes are only temporary.	No changes are proposed to the strategy or amendment.
	9	Ongoing focus on 'main street' urban structure/design vs a need to ensure centre layouts and building structures enhance customer convenience and attract more customers.	A key objective of the Activity Centres Strategy is to make our centres better places for people, and encourage people to spend more time in centres. It is consistent with state planning policy, and the public health objectives for 20 minute walkable town centres and street based centres. This has been shown to add long term value to a community.	No changes are proposed to the strategy or amendment.
	10	Network hierarchy does not appear to align with the Plan Melbourne categorisation. The strategy appears to amend existing definitions between Metropolitan and Major activity centres, remove 'Large' Neighbourhood Activity Centres, and rating Medium and Local definitions.	Plan Melbourne has three categories of Activity Centre. Metropolitan, Major and Neighbourhood. Metropolitan and major activity centres are designated by the State Government. Neighbourhood Centres can be designated by Local Councils. The Casey Activity Centres Strategy breaks neighbourhood centres into two namely Medium and Local.	No changes are proposed to the strategy or amendment.
	11	Woolworths considers the hierarchy and definitions should be better amended to directly align with Plan Melbourne, or the existing categories should be retained.	Clause 22.01 of the Casey Planning Scheme currently lists four categories of retail based activity centres. Metropolitan and Principal Activity Centres (renamed to Metropolitan), Major Activity Centres (no change), Neighbourhood Activity Centres (renamed to Medium Neighbourhood Activity Centres), and Convenience Activity Centres (renamed to Local Neighbourhood Activity Centres).  The only changes from the existing policy are the removal of Principal from the Metropolitan and Principal Activity Centres classification (consistent with Plan Melbourne), and the renaming of the two smaller categories to two different neighbourhood classifications to be consistent with Plan Melbourne (which just has a Neighbourhood classification for all).  The proposed hierarchy categories are generally consistent with the current categories in the scheme. The floorspace guidelines (which indicate approximate ranges for commercial floorspace) are new. The current Casey Planning Scheme does not provide floorspace area guidelines.	No changes are proposed to the strategy or amendment.

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	12	It is unclear why some currently defined 'Large' Neighbourhood Activity Centres are proposed to be redefined as Medium Neighbourhood Activity Centres.	The Casey Planning Scheme does not include a Large Neighbourhood Activity Centres category. The 2012 <i>Casey Activities Areas and Non-Residential Uses Strategy</i> (which was not implemented into the Casey Planning Scheme) did include this category, with one existing centre, and three proposed centres (one of which has been built). This category was removed from the 2019 strategy for simplicity.	There is limited value in adding the 'Large Neighbourhood Activity Centre', as the role and function will be similar to a Medium Neighbourhood. Council is happy to consider Panel's advice on this.
	13	Marriott Waters is defined 'Large' Neighbourhood Activity Centre, and the new strategy proposes to redefine it as a Medium Neighbourhood Activity Centre. According to the SGS report it is planned to expand to over 36,000m <sup>2</sup> of floorspace at 2036, inconsistent with the 5,000-20,000m <sup>2</sup> of floorspace the strategy envisages for a Medium Neighbourhood Activity Centre.	The SGS report identifies expansion space to 36,000m <sup>2</sup> . The more detailed site planning incorporated into the Casey Planning Scheme through the Comprehensive Development Zone demonstrates lessable floorspace at full build out of 33,000m <sup>2</sup> . The floorspace ranges in the strategy are intended as guides, and not minimums and maximums. The full build out floorspace for Marriot Waters is still substantially above the indicative size for a medium neighbourhood centre, and the panel may provide further advice to Council.	There is limited value in adding the 'Large Neighbourhood Activity Centre', as the role and function will be similar to a Medium Neighbourhood. Council is happy to consider Panel's advice on this.
	14	Inconsistencies of catchments and role and function of Marriott Waters, Cranbourne West (cnr Hall and Evans Road), and Central Parkway activity centres, all being classified as Medium Neighbourhood Activity Centres, given floorspaces. SGS predicts the smallest (Central Parkway) will be 5,000m <sup>2</sup> by 2036, the largest being 36,000m <sup>2</sup> . Using this example, activity Centres like Central Parkway should be reconsidered and recategorised, or remove the local and medium labels.	The Cranbourne PSP identifies that the Central Parkway should grow to a total of 7,000m <sup>2</sup> of lessable floorspace, indicating an inconsistency with the SGS report, or (quite likely) that the centre will still not be fully built out by 2036. While the SGS report considered built out and demand to 2036, the PSP's envisage floorspace to full build-out, which may be beyond 2036. The strategy proposes two categories for Activity Centres below Major, consistent with our current policy. A number of councils break this down to many more categories (sometimes 5), as a small local centre with three shops operates quite differently to a small centre with a 2500m <sup>2</sup> supermarket and 15 specialty shops. Officers are satisfied that the current approach is appropriate, but happy to seek further advice from the Panel.	Changes are not proposed to be made to the hierarchy, but officers are happy to take the advice of panel.
	15	The Strategy does not use trading performance of existing Activity Centres, relying on estimations of 'potential floorspace capacity'. All Woolworths supermarkets are currently underperforming. 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.	Given the large number of centres (81 including 49 existing), it is not practical to do a detailed trading assessment of each centre. All new centres in growth areas are determined through the PSP process, consistent with state-wide practices. The strategy stresses the need for viable centres serving appropriate catchments. The strategy seeks to expand the users of centres, and the desirability of those catchments. It is noted that the strategy isn't just about retail floorspace, it is about commercial floorspace which includes non-retail uses and locating community uses and services. This will also help increase the catchment for retailers.	

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	16	Proposed 'aspirational roles' of Activity Centres is flawed, and inconsistent with State Policy. Centres should align with their proposed function, and performance should be monitored.	There are two aspirational centres identified in the strategy. The aspirational nature of these does not change the hierarchy, but simply identifies two centres which Casey intends to advocate for higher designation in future Plan Melbourne Reviews, as only the State Government can designate Major and Metropolitan centres. The aspirational roles have not been included in the amendment.	No changes are proposed to the strategy or amendment.
	17	Urban design provisions do not consider the changing nature of retail given technology. 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 urban design guidelines are consistent with the Urban Design Guidelines for Victoria, and adapted for local application. A key objective of the strategy is to encourage more people into activity centres and promote linger time. If more people visit activity centres for non-retail purposes, this will increase the catchment of potential customers for retailers. While online retailing will increase, this is not likely to impact to the extent suggested. Furthermore, online retailing should not dictate the design of streets and activity centres. The purpose of the strategy is to make activity centres more resilient in the face of competition from online shopping. In fact improving the public realm can create an experience to assist driving people back to local retailers (particularly small retailers).	No changes are proposed to the strategy or amendment.
	18	Urban design guidelines fail to acknowledge the key design differences between different categories of centre, and ingredients to assist in economic success.	The urban design guidelines are quite general, and allow a degree of flexibility based on their application. They are consistent with the Urban Design Guidelines for Victoria.	No changes are proposed to the strategy or amendment.
	19	Pedestrian movement is important, but must be balanced with suitable access to car parking. 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.	Strategy provides a range of options, but seeks not to have large car parking areas in front of buildings. Feedback from earlier stakeholder engagement with Woolworths was taken into account developing this policy which initially required all large car parks to be located behind the building. This was revised to behind or beside, and being clearer that some car parking could be in front. State policy supports integrated access and movement and street based centres that prioritise people over cars.	No changes are proposed to the strategy or amendment.
	20	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	While it is convenient to locate car parking at the front at the door, an objective of the strategy is to have more people spend more time in activity centres. Activity centre policy is designed to plan for broader community good, not just individual businesses.	No changes are proposed to the strategy or amendment.

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	21	Provisions for greater residential density in and around neighbourhood activity centres 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.	Clause 21.03-3 includes the new strategy of <i>Support housing development in and adjoining activity centres that seeks to minimise adverse amenity impacts such as noise, that existing and proposed non-residential uses will have upon new residential uses.</i> This could be revised to add visual impacts after 'noise' so address this.	Revise new strategy at clause 21.03 to <i>Support housing development in and adjoining activity centres that seeks to minimise adverse amenity impacts such as noise and visual impacts, that existing and proposed non-residential uses will have upon new residential uses.</i>
	22	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.	Non retail activity has been allowable and encouraged under the zone and state policy of the Casey Planning Scheme for some time. However, newer developments have failed to provide an adequate diversity of floorspace. The policy changes will set expectations for floorspace to be developed. However it is acknowledged that this is discretionary only, and provision of non-retail floorspace will be weighed up against other considerations such as design.	No changes are proposed to the strategy or amendment.
14	1	Encourages Council to consider whether the amendment and strategy have contemplated risk in bushfire prone areas, and areas nearby hazard vegetation or future open space.	There are a number of existing or planned activity centres that do or will have a degree of bushfire risk. Where the activity centre is in a BPA in a growth area, the development cycle will most likely mean the bushfire risk no longer exists by time the centre is developed. As housing is developed, bushfire hazard is removed. The exceptions to this is where an activity centre is on the edge of the Urban Growth Boundary, and the land opposite will remain unmanaged.	No changes are proposed to the strategy or amendment.
	2	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.	There is one activity centre in BMO, in the Brompton Lodge PSP. The BMO will remain in place as the PSP is developed due to fire risk outside the PSP area. The PSP sets some requirements around bushfire risk. The PSP identifies a setback from Cranbourne-Frankston Road for almost the entire activity centre. Adjoining this setback is large car parking areas providing a further setback between the buildings and fire hazard. The activity centre layout in the PSP also provides for five roads to and from the activity centre, three of which direct people away from the bushfire hazard. Officers believe existing policy settings (primarily clause 13.02-1s, the BMO itself and the PSP) adequately addresses bushfire risk at this site.	No changes are proposed to the strategy or amendment.

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		<p>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.</p>	<p>Clause 13.02-1S addresses bushfire risk across the whole state. The Bushfire Management Overlay (BMO) addresses bushfire risk in the highest risk areas. There are many areas where bushfire is a risk, but not as high a risk as in the BMO. There are around five activity centres that will be in Bushfire Prone Areas (BPA) where the BPA designation may remain after development. At present there are no bushfire planning controls over these areas (BMO), and the building regulations requiring construction to a particular level only apply to residential buildings (commercial buildings have other fire regulations, mainly addressing fire regulations).</p> <p>There is an opportunity to ensure bushfire risk is considered in terms of design/site layout of activity centres, to consider things like access and egress, and site layout in terms of the hazard.</p>	<p>Under Clause 22.01-7 (Great places for people), add under Policy Guidelines: Design response to bushfire in areas of bushfire risk.</p>
		<p>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 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.</p>	<p>Officers have discussed the submission with its author at the CFA. The CFA acknowledge that bushfire risk is low, but are seeking Council document how they assessed it is low, and what mitigation measures are in place where they are. They are not seeking any substantial changes to the amendment, rather an acknowledgement of bushfire risk, and documentation of where this has been assessed. The discussion with the CFA has indicated that this report address this.</p>	<p>No changes are proposed to the strategy or amendment.</p>