

The logo for URBIS, featuring the word "URBIS" in a bold, white, sans-serif font. The text is positioned to the left of a white square frame that is partially open on the right side. A thick white line runs horizontally across the page, intersecting the square frame.

URBIS

AMENDMENT C258 CASEY PLANNING SCHEME

Planning Evidence, Eden Rise Shopping Centre,
1 O'Shea Road, Berwick

INTRODUCTION

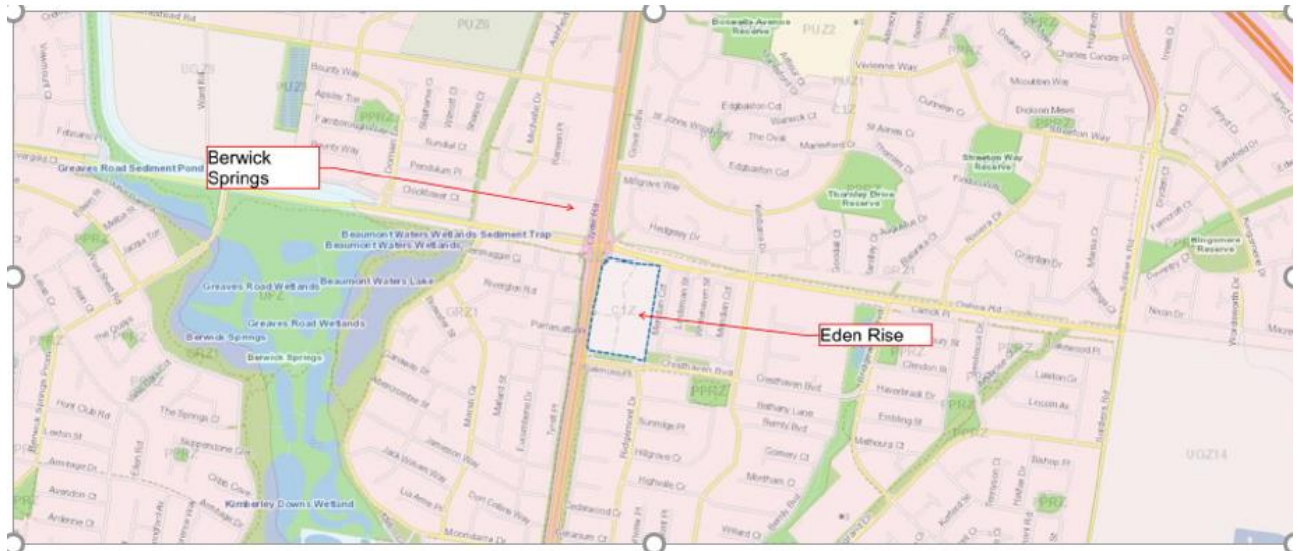
1. My name is Stuart Andrew McGurn and I am a Director of Urbis Pty Ltd (Urbis) which conducts its business at Level 12, 120 Collins Street, Melbourne. My qualifications and experience are described at **Appendix A**.
2. I have been instructed by SJB on behalf of Charbury Pty Ltd (a company of the Pask Development Group) to undertake a town planning review of exhibited Amendment C258 to the Casey Planning Scheme.
3. Amendment C258 proposes to:
 - Introduce a new Activity Centres Policy at Clause 22.01 to replace the existing Retail Policy, including the Casey Activity Centres Strategy 2019 as a reference document;
 - Amend the existing Non-Residential Uses in Residential and Future Residential Areas Policy at Clause 22.02; and
 - Make consequential changes to the Municipal Strategic Statement at Clause 21, including the Strategic Framework Plan and Local Area Maps and activity centre network map.
4. The Amendment was exhibited in October to December 2019 and was the subject of submissions which generally supported the amendment overall but raised issues with implementation measures of the Strategy.
5. The Amendment was considered at a City of Casey Council Meeting in March 2020, where it resolved to refer to the submissions to an Independent Panel for consideration.
6. My opinion of the proposed Amendment has been informed having regard to:
 - An inspection of the site and locality.
 - Exhibited Casey Planning Scheme and reference documents of relevance.
 - Ministerial Direction 11 'Strategic Assessment Guidelines for Planning Scheme Amendments' and other Ministerial Directions relevant to the Amendment.
 - City of Casey Activity Centres Strategy, 2019
 - Casey Activity Centres, Retail and Other Employment Floor Space Assessment, 2017
 - Activity Centres Strategy Background Paper, 2019
 - City of Casey Activity Centres Strategy, 2006
7. I note I have received Council's Part A Submission but have not had sufficient time to review prior to finalising my evidence statement for circulation. If anything of substance arises from my review of this submission, I will address it in the presentation of my evidence.
8. My views in relation to the proposed Amendment C258 are summarised as follows:
 - There seems to be no strategic justification for the designation of Berwick Springs mixed use area as an existing Medium Neighbourhood Activity Centre with the potential to become a Major Activity Centre in combination with Eden Rise.
 - There are significant impediments to the co-location of Eden Rise and Berwick Springs mixed use area as a medium neighbourhood activity centre which have not been considered and which will inhibit the effective integration of the two centres.
 - The elevation of the Berwick Springs mixed use area has the potential to diminish the retail performance of Eden Rise and undermine the integrity of the hierarchy of the wider Municipality.

9. I declare that I have made all the enquires that I believe are desirable and that no matters of significance which I regard as relevant have, to my knowledge, been withheld from the Panel.

SUBJECT SITE AND LOCALITY

10. The Eden Rise shopping centre is located at 1 O'Shea Road at the south-east corner of O'Shea Road and Clyde Road, Berwick South (refer Figure 1). Berwick Springs mixed use area is located diagonally opposite at 288-296 Clyde Road, Berwick.

Figure 1 – Location Plan



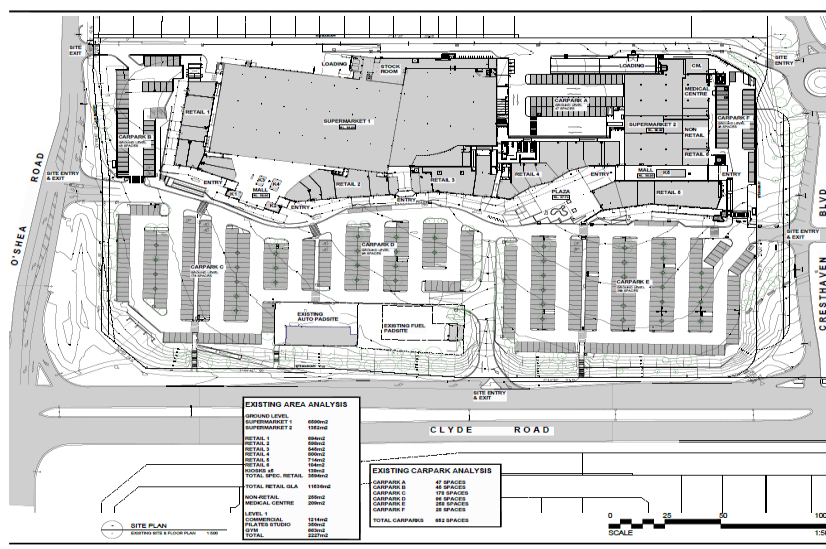
11. The Eden Rise Shopping Centre is:

- located on a site 1.3 hectares in area
- developed with a variety of retail and commercial premises
- comprised of at-grade car parking around the periphery of the site.
- 13,800 square metres of retail floor area is provided, 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 2 – Eden Rise Shopping Centre



Figure 3 – Eden Rise Shopping Centre Layout



12. The Berwick Springs mixed use area is located diagonally opposite. The site is contained within the General Residential Zone and Development Plan Overlay Schedule 1.

13. This centre has developed incrementally over time, with planning permits having been granted for each of the key developments presently on site and allowable within the zone. The land uses include:

- Zagame's Berwick Hotel, drive through bottle shop and pokies venue at the north-western corner of Greaves Road and Clyde Road. It is located centrally within a large carpark and the land to the west is undeveloped

- A single storey building containing a radiology centre, gym and takeaway premises
- BP service station
- A part single, part two storey building containing a number of takeaway outlets and office uses, with car parking around the edges
- Additional takeaway and drive through venues and associated carparking which continue to and beyond Homestead Road
- A child care centre accessed from Homestead Road
- Vacant land at the western edge of the site fronting Greaves Road

Figure 4 – Berwick Springs mixed use area



PROPOSED PLANNING SCHEME AMENDMENT

14. Proposed Amendment C258 implements the City of Casey Activity Centre Strategy 2019 by amending Clause 21.05 Economic Development and replacing the Retail Policy at Clause 22.01 of the Casey Planning Scheme with an Activity Centres Policy. Clause 21.10 is updated to alter policy as it relates to the various local areas. Clause 22.02 (Non Residential Uses in Residential and Future Residential Areas Policy) is also amended as well as changes to the MSS to reflect the updated Strategy.
15. Specifically, the Amendment:
- Implements the City of Casey Activity Centre Strategy 2019 and includes the Strategy as a reference document;
 - Amends Clause 21.05 Economic Development to (inter alia):
 - 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;
 - reference Eden Rise and Berwick Springs mixed use area 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:
 - 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';
 - 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';
 - 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';
 - 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):
 - 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);
 - 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);
 - 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);
 - 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:

- 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;
 - 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.

CITY OF CASEY ACTIVITY CENTRE STRATEGY 2019

16. The purpose of this Strategy is to *‘articulate Council’s vision for a network of activity centres in Casey and provide guidance on how to accomplish this vision through clear policy direction on the location, size and design on non-residential use and development across the municipality.’*
17. It is proposed that this Strategy will be included in the scheme as a Reference Document and the document is based on assessments provided in the:
 - *Casey Activity Centres: Retail and Other Employment Floorspace Assessment*, Final Report, SGS for the City of Casey, November 2017, and
 - *Activity Centres Strategy Background Paper*, 2019, City of Casey
18. Objective 1 of the Strategy relates to the hierarchy of centres and seeks *‘To consolidate Casey’s retail and commercial development patterns into a clear hierarchy of activity centres, with appropriately sized centres to meet the needs of Casey’s communities through to 2036.’*
19. Table 1 to this objective sets out the Activity Centre Hierarchy for the municipality (refer to Table 1).

Table 1 – Activity Centres Hierarchy

Type	Approx. Total Non-Residential floor space	Characteristics and Function
Metropolitan	More than 100,000 sqm	<ul style="list-style-type: none"> • Plays a key regional role in the metropolitan economy, providing a diverse range of employment opportunities for the region. • Provides a broad mix of higher-order activities including entertainment uses. Attracts a significant level of visitation. • A strong focus on supermarkets of various sizes • Department stores and multiple discount department stores • A strong focus on specialty retail and hospitality uses • Some restricted retail uses • Strong focus on commercial uses, health and education facilities, and high density residential uses • Approximately 40 per cent non-retail commercial, institutional and community uses floor area for the whole of the centre. • Building heights of at least three storeys, except where there is an interface with residential areas. • Easily accessible connections to the Principal Public Transport Network.

Major; Major (Aspiring to Metropolitan)	20,000 up to 100,000	<ul style="list-style-type: none"> Provides a broad mix of higher-order activities including entertainment. Attracts a significant level of visitation. A strong focus on supermarkets of various sizes Multiple discount department stores A strong focus on specialty retail and hospitality/entertainment uses and high density residential uses Some restricted retail uses A medium focus on commercial uses Some health and education facilities Approximately 30 per cent non-retail commercial, institutional and community uses floor area for the whole of the centre. Most buildings at least 2 storeys in height Easily accessible connections to the Principal Public Transport Network.
Medium Neighbourhood; Neighbourhood (Aspiring to Major)	5,000 to 20,000 sqm	<ul style="list-style-type: none"> Provides for day-to-day and weekly retail and service needs at a neighbourhood level Strong focus on supermarkets, with a mix of full-line and small format supermarkets and medium density housing, or high density housing where the centre is Aspiring to Major. A medium focus on specialty retail and hospitality uses Higher focus on retail uses where the centre has been identified as Aspiring to Major. A medium focus on commercial uses Approximately 25 per cent non-retail commercial and community uses floor area for the whole of the centre Most building heights of at least two storeys.
Local Neighbourhood	Up to 5,000 sqm	<ul style="list-style-type: none"> Provides for day-to-day and weekly retail and service needs at a neighbourhood level Small format supermarket Some specialty retail and hospitality uses Some commercial uses Focus on convenience retailing and medium density residential uses Approximately 25 per cent non-retail commercial and community uses floor area for the whole of the centre.
Health and Education Precinct	Not specified	<ul style="list-style-type: none"> To continue to grow as a significant health and education-based employment precinct in Casey and surrounding municipalities. A strong focus on major health and education facilities and commercial uses Some specialty retail and hospitality uses, particularly where they service the health and education facilities of the precinct. Complementary high density residential uses.
Restricted Retail Precinct	5,000 to 50,000 sqm	<ul style="list-style-type: none"> To provide convenient access to a comprehensive range of bulky goods across the municipality. A strong focus on restricted retail uses A small amount of supporting hospitality uses Discourage larger format or full line supermarket uses

20. The Activity Centres Map and Table 2 of the Strategy identify both Eden Rise and Berwick Springs mixed use area as two medium neighbourhood centres (aspiring to be a single major).

21. Objective 4 relates to 'Neighbourhood Activity Centres', which are identified as being centres for '*day to day and weekly retail service needs at a neighbourhood level*'. Of note, Strategy S4.5 is to '*support the establishment of a Berwick South Central Major Activity Centre in Plan Melbourne*'. This would be a consolidation of the Eden Rise (No 9a) and Berwick Springs mixed use area (No 9b) Medium Neighbourhood Activity Centres into a single Major Activity Centre.
22. The City of Casey Activity Centres Strategy Action Plan 2019 accompanies the Activity Centre Strategy and sets out how the Strategy will be delivered. Action 6 includes advocacy for Eden Rise/Berwick Springs for Major Activity Centre status while Action 7 is to apply a Comprehensive Development Zone (CDZ) to Berwick Springs with '*an incorporated plan that ensures a street-based high-quality design*'. Action 7 has a 'high' priority.
23. The Strategy includes assessment guidelines for the consideration of Out-of-Centre developments which include a range of requirements for consideration including but not limited to the need/justification, proximity to other centres, the impact of change, accessibility and precedent.
24. The Strategy also provides urban design guidelines for activity centres covering urban structure, movement, public spaces, public transport, built form and public realm.

BACKGROUND REPORTS TO CITY OF CASEY ACTIVITY CENTRE STRATEGY 2019

Casey Activity Centres: Retail and Other Employment Floorspace Assessment, Final Report, SGS for the City of Casey, November 2017

25. This report was prepared to inform the development of a new Activity Centres Strategy. The report identifies a new centre hierarchy and action plan.
26. The report identifies zoning irregularities where zoning should be reviewed. Eden Rise and Berwick Springs are identified and the report recommends that the zoning of Berwick Springs mixed use area be '*reviewed holistically*' with a '*long term plan to integrate the two centres and apply an appropriate zone*'.
27. At page 89, the report envisages the Eden Rise centre will be '*expanded to include existing retail and employment activity referred to as Berwick Springs. Integration of the two halves of the new centre will need to be further investigated*'.
28. The defining characteristics of Major Activity Centres are identified as:
 - *Located along the Principal Public Transport Network and connected to the arterial road network, they are situated in highly accessible locations.*
 - *Comprise a total floorspace of around 20,000 to 100,000 sqm.*
 - *Support a range of retail and service choice, including 1-2 discount department stores and two or more supermarkets.*
 - *Include higher density housing within, or in proximity to, the centre.*
 - *Provide good public, private and active transport access.*
 - *Unique identity.*
29. The identified Strategies for Major Activity Centres are:
 - *Facilitate improved walkability to, in and around these centres by prioritising pedestrian transit over vehicular transit, and maximising proximity to public transport.*
 - *Support the development of Casey Central, Narre Warren South as a vibrant mixed use centre offering a wide range of services, facilities and jobs.*

- *Identify preferred land use zoning and policy to be applied to Hardys Road (Clyde North) and Clyde Town Centre and advocate for this through the PSP process. This should address land use, built form, walkability to and around the centres, transport and car parking.*
- *Ensure interim treatments and uses for unused land are included.*

Activity Centres Strategy Background Paper, 2019, City of Casey

30. Eden Rise and Berwick Springs are described in the report at page 12, as follows:

'The Eden Rise centre is a significant Medium Neighbourhood Activity Centre located at the southern end of Berwick. It is on the larger end of the spectrum for a Medium NAC, with approximately 15,000 square metres floorspace currently and the market catchment that provides the potential to grow to approximately 32,000 square metres in floor area by 2036. Berwick Springs is an ad-hoc grouping of retail developments to the northwest of Eden Rise. This development is currently not designated as an activity centre and has been established over time through a series of discretionary planning permit approvals on residential zoned land due to its locational attributes at the intersection of two arterial roads and its close proximity to Eden Rise.

The Employment Floorspace Assessment provides strategic justification for the future establishment of a Berwick South Central Major Activity Centre in Plan Melbourne. This would be a consolidation of the Eden Rise and Berwick Springs Medium Neighbourhood Activity Centres into a single Major Activity Centre. This aspirational Major designation is not proposed in the new hierarchy but is recommended as future advocacy item to include in the next update of Plan Melbourne. In the meantime, Eden Rise and Berwick Springs are proposed to be designated as two separate Medium NACs.

CASEY PLANNING SCHEME – EXISTING PROVISIONS

EDEN RISE ZONING

31. The Eden Rise Shopping Centre is currently contained within the C1Z, it is included within the Development Plan Overlay, Schedule 1.
32. The purpose of the Commercial 1 Zone is:
- *To implement the Municipal Planning Strategy and the Planning Policy Framework.*
 - *To create vibrant mixed use commercial centres for retail, office, business, entertainment and community uses.*
 - *To provide for residential uses at densities complementary to the role and scale of the commercial centre.*
33. Under the provisions of the C1Z, 'retail premises' is an 'as of right' use.

Figure 5 – Zoning Plan



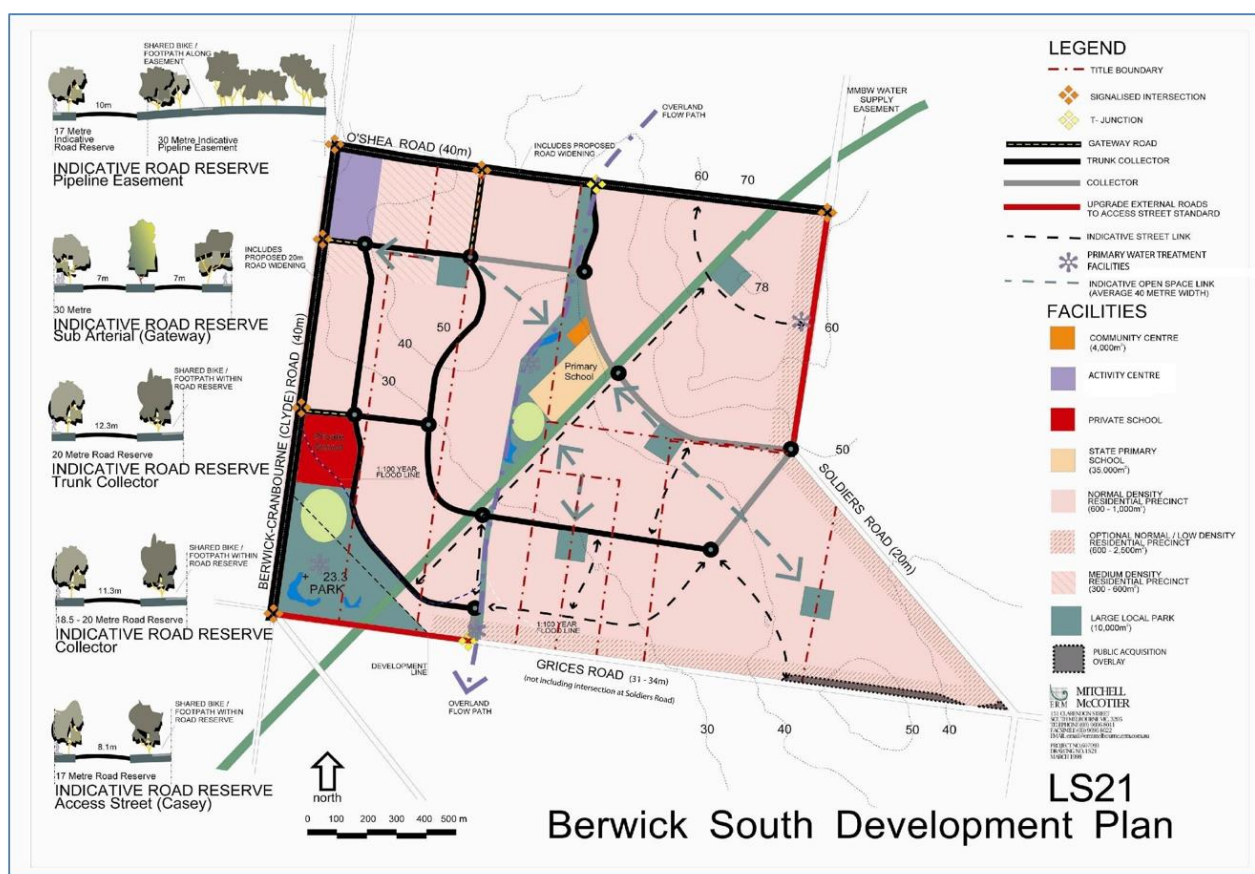
EDEN RISE OVERLAYS

34. The site is also affected by the Development Plan Overlay, Schedule 1 (DPO1). The purpose of this overlay is:
- *To implement the Municipal Planning Strategy and the Planning Policy Framework.*
 - *To identify areas which require the form and conditions of future use and development to be shown on a development plan before a permit can be granted to use or develop the land.*
 - *To exempt an application from notice and review if a development plan has been prepared to the satisfaction of the responsible authority.*
35. Under the requirements of the DPO, a permit must not be granted to use or subdivide land, construct a building or construct or carry out works until a development plan has been prepared to the satisfaction of the responsible authority. A permit granted must be generally in accordance with the development plan and include any conditions or requirements specified in a schedule to this overlay.
36. Schedule 1 to the DPO allows for a permit to be granted before a development plan has been prepared to the satisfaction of the responsible authority to subdivide land to create a lot for an existing building.

Berwick South Development Plan

37. The Berwick South Development Plan has been approved under Clause 43.04 of the Casey Planning Scheme for the Berwick South area. Council is required to take the Development Plan into account, when assessing planning applications for the use, development and subdivision of land in the area and land use, development and subdivision must generally accord with this Development Plan.
38. The Development Plan covers an area of 293 hectares bounded by O'Shea Road, Soldiers Road, Grices Road and Clyde Road in Berwick South. Notably, the land containing the Berwick Springs mixed use area is excluded from this document.
39. The Development Plan makes provision for an Activity centre and its scale is related to a defined catchment. The role of the centre is defined as *'a wide range of retail and commercial activities within the Centre to support the anchor/s, provide for a diverse range of goods and services, and service the wider catchment population. In a retail context, it is anchored by supermarket(s) and provides a wide range of food based merchandise supported by a variety of non-food stores.'* (1.2.8)
40. The Berwick South Development Plan is depicted below in Figure 6. It shows Eden Rise as the activity centre.

Figure 6: The Berwick South Development Plan



BERWICK SPRINGS ZONING

41. The Berwick Springs mixed use area is contained within the General Residential Zone, Schedule 1 and the Development Plan Overlay. The purpose of the GRZ1 is:
 - To implement the Municipal Planning Strategy and the Planning Policy Framework.
 - To encourage development that respects the neighbourhood character of the area.

- To encourage a diversity of housing types and housing growth particularly in locations offering good access to services and transport.
- To allow educational, recreational, religious, community and a limited range of other non-residential uses to serve local community needs in appropriate locations.

42. Under this zone, use of the site for 'Office (other than Medical centre)', 'Retail premises (other than Convenience shop, Food and drink premises, Market, and Plant nursery)' amongst others are prohibited uses. I note that a permit can be sought for 'Place of Assembly', 'Take Away Food Premises' and 'Convenience Restaurant' amongst others.

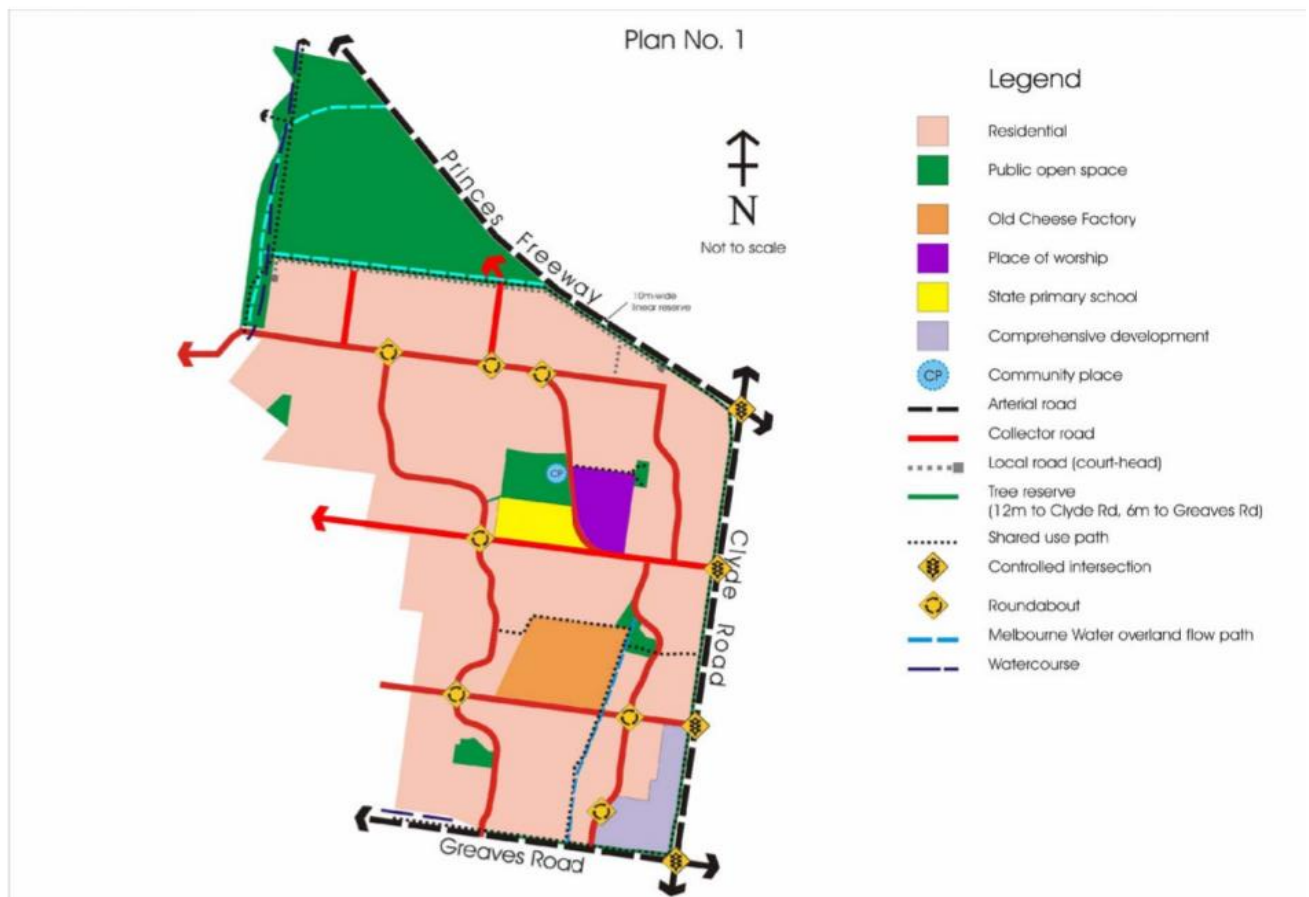
BERWICK SPRINGS OVERLAYS

43. This site is affected by DPO1, consistent with Eden Rise.

Cell T Development Plan

44. Berwick Springs mixed use area is located within the Cell T development plan approved under Clause 43.04. This development plan covers the area bounded by Princes Freeway to the north, Clyde Road to the east, Greaves Road to the south and the Rural Living zoned land to the west. The Cell has an area of approximately 267 hectares.
45. Berwick Springs mixed use area is identified within the plan for 'comprehensive development (Refer Figure 7 below). At 5.5 the development plan identifies that a 'comprehensive development proposal is proposed for the land (formerly approved medium density housing site) to include a range of restaurants, fast food outlets and a childcare centre.' The plan goes on to state, 'this site is one of the few sites in the part of Berwick south of the Freeway that is suitable and available for commercial development to service the needs of the local community.'

Figure 7 - The Cell T Development Plan



PLANNING POLICY FRAMEWORK

46. Key themes of relevance to the proposed Amendment within the Planning Policy Framework include:

- **Clause 11.01-1S** 'Settlement' seeks to promote the sustainable growth and development of Victoria and deliver choice and opportunity for all Victorians through a network of settlements'. Strategies for this objective include:
 - *Develop compact urban areas that are based around existing or planned activity centres to maximise accessibility to facilities and services.*
 - *Ensure retail, office-based employment, community facilities and services are concentrated in central locations.*
- **Clause 11.01-1R** 'Settlement – Metropolitan Melbourne' identifies the need to 'develop a network of activity centres linked by transport, consisting of Metropolitan Activity Centres supported by a network of vibrant major and neighbourhood activity centres of varied size, role and function.'
- **Clause 11.02-1S** relates to the 'Supply of urban land' and seeks to ensure a sufficient supply of land for varied land uses including commercial and retail.
- **Clause 11.03-1S** 'Activity Centres' encourages the concentration of major retail, residential, commercial, administrative, entertainment and cultural developments into activity centres that are highly accessible to the community.
 - *Build up activity centres as a focus for high-quality development, activity and living by developing a network of activity centres that:*
 - *Comprises a range of centres that differ in size and function.*
 - *Is a focus for business, shopping, working, leisure and community facilities.*
 - *Provides different types of housing, including forms of higher density housing.*
 - *Is connected by transport.*
 - *Maximises choices in services, employment and social interaction.*
 - *Support the role and function of each centre in the context of its classification, the policies for housing intensification, and development of the public transport network.*
 - *Undertake strategic planning for the use and development of land in and around activity centres.*
 - *Reduce the number of private motorised trips by concentrating activities that generate high number of (non-freight) trips in highly accessible activity centres.*
 - *Improve access by walking, cycling and public transport to services and facilities.*
 - *Support the continued growth and diversification of activity centres to give communities access to a wide range of goods and services, provide local employment and support local economies.*
 - *Encourage economic activity and business synergies.*
 - *Improve the social, economic and environmental performance and amenity of activity centres.*
- **Clause 11.03-1R** – 'Activity Centres – Metropolitan Melbourne' seeks to support the development and growth of Metropolitan Activity Centres. For Neighbourhood Activity Centres, small scale education, health and community facilities that meet local needs are encouraged.
- **Clause 15.01-1S** relates to 'Urban design' and seeks to 'create urban environments that are safe, healthy, functional and contribute to a sense of place and cultural identity.' This includes:
 - *Requiring development to respond to its context in terms of character, cultural identity, natural features, surrounding landscape and climate.*
 - *Ensuring that development provides landscaping that supports the amenity, attractiveness and safety of the public realm.*

- Ensuring development contributes to community and cultural life by improving the quality of living and working environments, facilitating accessibility, and providing for inclusiveness.
- ‘The Urban Design Guidelines for Victoria’ (Department of Environment, Land Water and Planning 2017) are listed as a relevant policy document under Clause 15.01-1S. S.5.3 of the Guidelines includes specific reference to large format retail premises. This includes the following objectives:
 - 5.3.1 *To support an active frontage interface of large format retail premises with the street.*
 - 5.3.2 *To support safe and direct pedestrian and cyclist access to large format retail premises.*
 - 5.3.3 *To integrate the built form of large format retail premises into activity areas and their surrounding neighbourhoods.*
 - 5.3.4 *To support the safety and amenity of the area around large format retail premises.*
- **Clause 15.01-4R** relates to ‘Healthy neighbourhoods – Metropolitan Melbourne’ and identifies as its Strategy to ‘create a city of 20 minute neighbourhoods, that give people the ability to meet most of their everyday needs within a 20 minute walk, cycle or local public transport trip from their home.’
- **Clause 17.02-1S** ‘Business’ seeks to encourage development that meets the community’s needs for retail, office and other commercial services. The strategies under this Clause relevant to this proposal include:
 - ‘Plan for an adequate supply of commercial land in appropriate locations.
 - Ensure commercial facilities are aggregated and provide net community benefit in relation to their viability, accessibility and efficient use of infrastructure.
 - Locate commercial facilities in existing or planned activity centres.
 - Provide new convenience shopping facilities to provide for the needs of the local population in new residential areas and within, or immediately adjacent to, existing commercial centres.
 - Provide small scale shopping opportunities that meet the needs of local residents and workers in convenient locations.
 - Provide outlets of trade-related goods or services directly serving or ancillary to industry that have adequate on-site car parking.
 - ...
 - Apply a five year time limit for commencement to any planning permit for a shopping centre or shopping centre expansion of more than 1000 square metres leasable floor area.’
- **Clause 17.02-2S** relates to Out-of-centre development. Under this Clause, the relevant strategies are:
 - Discourage proposals for expansion of single use retail, commercial and recreational facilities outside activity centres.
 - Give preference to locations in or on the border of an activity centre for expansion of single use retail, commercial and recreational facilities.
 - Discourage large sports and entertainment facilities of metropolitan, state or national significance in out-of-centre locations unless they are on the Principal Public Transport Network and in locations that are highly accessible to their catchment of users.
 - 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.

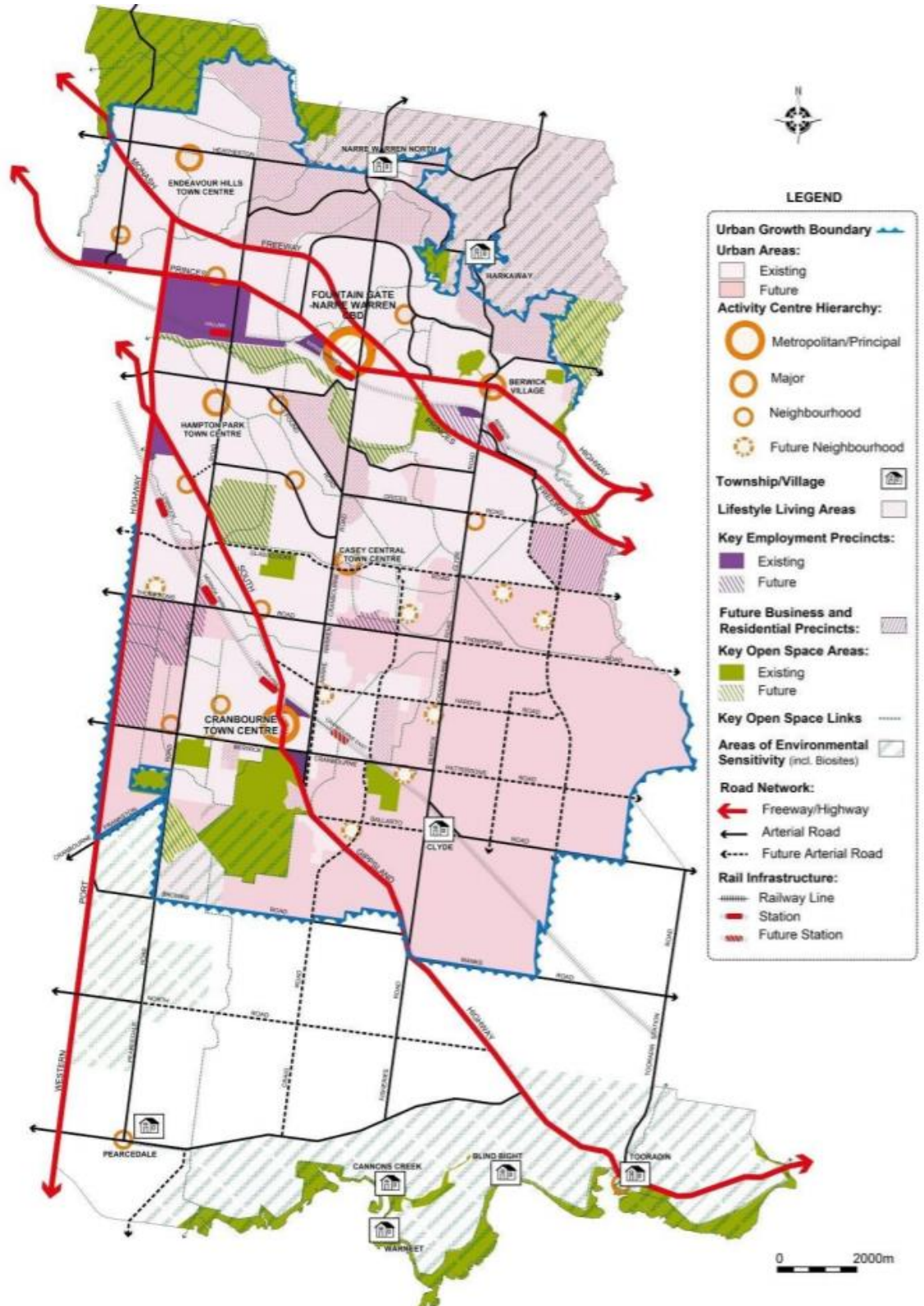
LOCAL PLANNING POLICY FRAMEWORK

47. The key local policies which are relevant to this proposal are:

- **Clause 21.01 – Introduction** identifies the two main primary activity centres in the municipality being Fountain Gate- Narre Warren (a Metropolitan Activity Centre) and Cranbourne Town Centre (a Major Activity Centre).

- **Clause 21.02 – Key Issues and Strategic Vision** includes the Strategic Framework Plan for Casey and identifies one of the strategic directions as ‘a hierarchy of activity centres that caters for the growth of individual centres.’ The framework plan at this clause includes the hierarchy of centres for the municipality. The Eden Rise centre is identified as a Neighbourhood Centre. ‘Future neighbourhood centres’ are identified on the plan. Berwick Springs mixed use area is not identified on the plan. (Refer Figure 8 below).

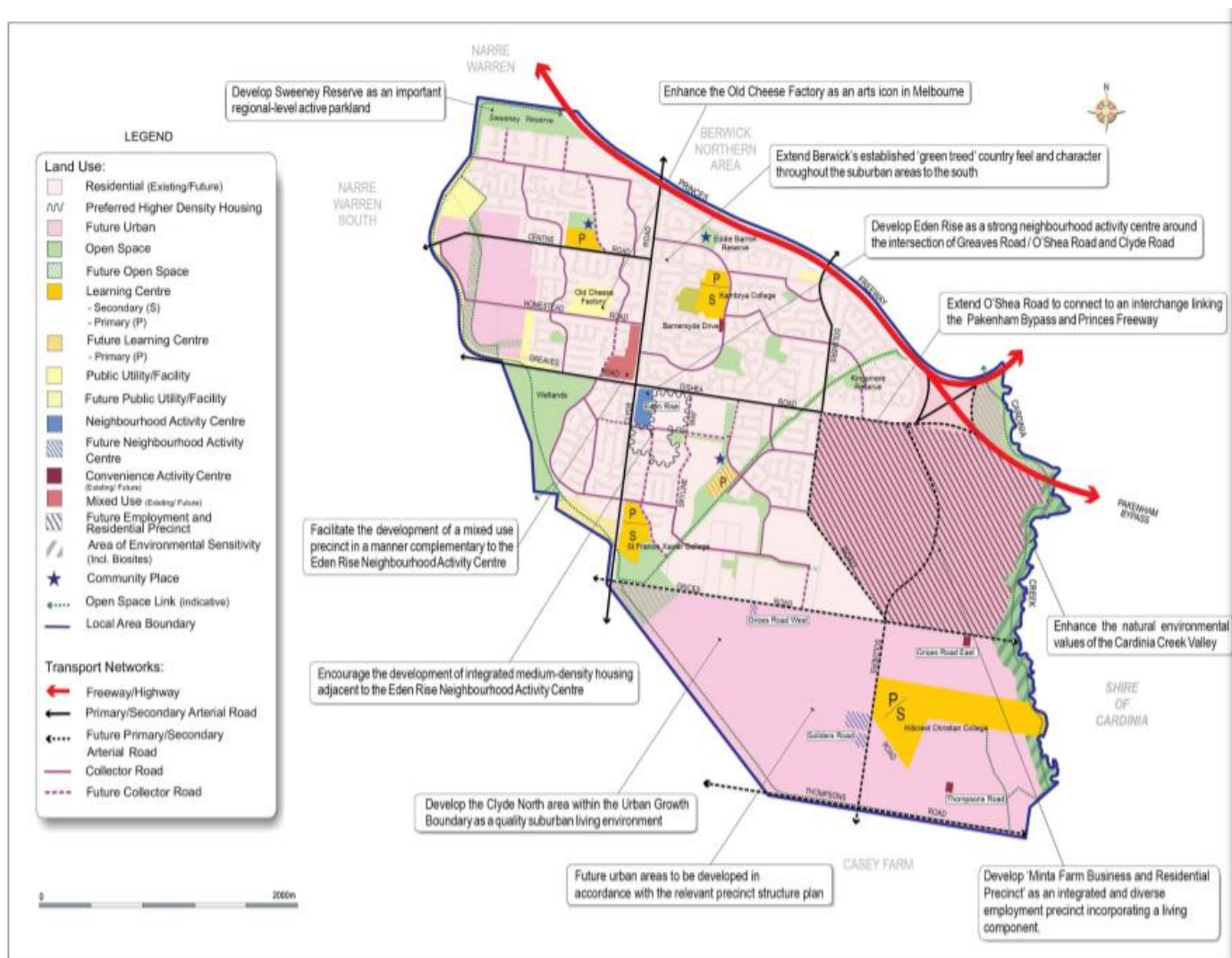
Figure 8 Current Strategic Framework Plan



- **Clause 21.05 – Economic Development** includes two objectives with objective 2 being to ‘*take advantage of Casey’s competitive edges to create local employment opportunities across a diverse economic base to secure a sustainable and prosperous future.*’ In relation to activity centres, the strategies include:
 - 2..4 Realise the significant potential for the Fountain Gate-Narre Warren CBD Metropolitan Activity Centre and Cranbourne Town Centre Principal Activity Centre as centres of metropolitan and regional significance, providing a broad range and high intensity of activities that maximise their future capacity.*
 - 2.5 Promote leading practice activity centre development that provides for economically robust centres with a vibrant community focus, and which can evolve to accommodate changing needs.*
- I note at **Clause 21.05-4** that the strategies are to be implemented by using the retail Strategy at Clause 22.01 and by applying the Commercial 1 Zone to Activity Centres with a primary retail function, or with an office and commercial function. The Mixed Use zone is to be applied to activity centres with a mixed use function, including employment centres and community activity clusters. Further strategic work also references a review of the City of Casey Activity Centres Strategy.
- Eden Rise and Berwick Springs mixed use area are located within Berwick South and **Clause 21.10** is relevant and includes the following relevant strategies:
 - *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.*

These strategies are included within the Berwick Southern Area Local Area Map (refer Figure 9).

Figure 9 – Berwick Southern Area Local Area Map



- **Clause 21.10-4** relates to the implementation of this Clause and in terms of use of policy and exercise of discretion states that future use and development of land should be generally in accordance with the Berwick Southern Area Local Area map and relevant structure plan. The retail Policy at Clause 22.01 is also to be used to provide for the orderly development and expansion of activity centres, including Eden Rise. In relation to the application of zones and overlays, the Commercial 1 Zone is to be applied to activity centres with a primary retail function, including the Eden Rise Neighbourhood Activity Centre and the Bemersyde Drive Convenience Activity Centre. There is also reference to the preparation of a structure plan for the Eden Rise Neighbourhood Activity Centre.
- The retail policy is contained at **Clause 22.01**. The policy objectives include:
 - *To consolidate Casey's retail and commercial development patterns into recognised and planned activity centres.*
 - *To develop a clear activity centre hierarchy.*
 - *To direct and facilitate a diversity of activity (retail, commercial, community, institutional, education, recreation and housing) in activity centres.*
 - *To ensure land use and development proposals for retail and commercial activities produce a net community benefit when measured against clear assessment criteria.*
 - *To manage floorspace allocations according to a management framework.*
 - *To consolidate the development within the retail core of the Fountain Gate-Narre Warren CBD as the Metropolitan Activity Centre serving the northern part of the City.*
 - *To consolidate the development within the retail core of the Cranbourne Town Centre as the Principal Activity Centre servicing the southern part of the City.*

- *To substantially strengthen the tier of major activity centres to provide high levels of service and competition, a basis for small business growth and to assist in the development of an effective public transport system.*
- *To develop robust Neighbourhood Activity Centres that are presently the weakest link in the retail hierarchy.*
- *To develop a greater role for planned Peripheral Sales Precincts.*
- *To resist pressure for isolated or ad-hoc ('out-of-centre') development outside of recognised activity centres.*
- *To provide car parking to satisfy the needs of users without detriment to local amenity.*
- At **Clause 22.01-3** the policy sets out the retail classifications for all activity centres in Casey which includes Metropolitan and Principal Activity Centres, Major Activity Centres, Neighbourhood Activity Centres (including Eden Rise), Convenience Activity Centres, and Peripheral Sales Precincts.
- The policy is set out at **Clause 22.01-4** and confirms it is policy that:
 - *New retail and commercial development is to occur in designated activity centres, unless otherwise provided for in this policy.*
 - *A structure planning process is to be used as the mechanism to ensure that floorspace allocations achieve the best net community benefit outcomes.*
 - *Structure plans are to be developed for all Metropolitan, Principal, Major and Neighbourhood Activity Centres and Peripheral Sales Precincts and will be required to be prepared in conjunction with any associated rezoning, greenfields planning or major redevelopment request.*
 - *Sufficient floorspace is to be available over the long-term to ensure each of the designated Metropolitan, Principal, Major, Neighbourhood and Convenience Activity Centres and Peripheral Sales Precincts can grow to fulfil their intended role, taking into account the general opportunities and constraints of each centre across the municipality.*
 - *Floorspace thresholds/limits for retail and commercial uses may be imposed on some centres/sites to ensure that the role of the centre is maintained and/or there is a balanced activity centre system for the City.*
 - *The broad allocation of floorspace to activity centres is to be based on the intended role of the centres rather than the precise floorspace to be provided.*
 - *The subdivision of activity centres is to be carefully managed to retain flexibility for redevelopment and evolution over time, resisting short-term pressures to subdivide centres into small units that can then be individually sold.*
 - *The regulation of commercial competition between individual businesses and activity centres should only occur where there is a prospect of an overall adverse impact upon the extent and adequacy of facilities available to the local community.*
 - *New retail and commercial development proposals are to make an appropriate contribution to infrastructure provision, including road and intersection works, streetscape upgrades, linking trails, community facilities, youth spaces, public art and other public spaces.*
- In relation to Neighbourhood and Convenience Activity Centres, it is policy that *'the need for additional Neighbourhood and Convenience Activity Centres arising from the development of new suburban areas is to be identified through the preparation of development plans for these areas.'*
- Cause **22.01-5** includes performance standards for the consideration of proposals.
 - *New retail and commercial development proposals (including rezonings) that are inconsistent with this policy, including 'out-of-centre' proposals and proposals that are contrary to the role of a centre, together with proposals that result in a floorspace threshold/limit for a centre/site being exceeded, must satisfactorily address the Development Assessment Criteria contained in the City of Casey Activity Centres Strategy, the criteria being:*
 - *Opportunity for choice.*
 - *Accessibility and convenience.*
 - *Amenity and safety.*

- *Viability and efficiency.*
- *Amenity and environment.*
- *Net community benefit.*
- *The assessment of a proposal's net community benefit, as required under this policy, must also take into consideration:*
 - *Activity diversity.*
 - *Public amenity.*
 - *Accessibility.*
 - *Social/cultural issues.*
 - *Environmentally sustainable development.*
 - *Any relevant guidelines/assessment criteria prepared by the Department of Environment, Land, Water and Planning.*
- **Clause 22.02** relates to Non-Residential Uses in Residential and Future Residential Areas Policy. The policy requires;
 - *In established residential areas, non-residential uses be located adjacent to an activity centre or commercial/industrial area, or within a recognised community activity cluster, and, wherever possible, nearby similar non-residential uses to reduce car dependency and maximise accessibility to public transport.*
 - *In new and future residential areas, non-residential uses be clustered around planned activity centres.*
 - *Non-residential uses be required to result in a net benefit and convenience to the local community.*
 - *Non-residential uses be located along roads that are capable of carrying anticipated traffic volumes, such as arterial or collector roads, and on or close to a designated public transport route.*
 - *Non-residential uses not be located fronting service roads due to the impact on the residential character of the arterial road and the potential for "ribboning" along such roads.*
 - *Non-residential uses do not segregate a single dwelling or a collection of dwellings from the surrounding residential area.*
 - *The scale, design and appearance of any new buildings, works or landscaping associated with a non-residential use be complementary to the existing or preferred character of the surrounding area.*
 - *Non-residential uses/developments be designed, constructed and operated in a manner that causes minimal loss of amenity, privacy and convenience to people living in nearby dwellings, having regard to traffic, car parking, access, built form and overall site layout.*
 - *New stand-alone places of assembly/worship be discouraged from locating in established residential areas.*
 - *Industrial/warehouse-type uses, such as land used for the storage of goods, vehicles or machinery, not be supported if the use would have an adverse impact on residential amenity, particularly in terms of vehicle noise and visual impact.*
 - *A master plan defining the parameters of future development be required to be submitted with a planning application in circumstances where less than 50 per cent of a site is proposed to be developed for a non-residential use (inclusive of associated car parking), or the balance of the site is of an area that has the potential to accommodate a significant expansion of the use.*

RELEVANT STRATEGIES

Casey 21: A Vision for our future (City of Casey, 2002)

48. This document set out a long-term vision for the City and principles for the achievement of the vision and is identified as a policy reference at Clause 22.01-6.

Casey 21: Building a Great City (City of Casey, 2011)

49. Casey 21: Building a Great City was an update and refresh of the first Strategy and responded to the expansion of the Urban Growth Boundary and the increase of nearly 50,000 residents to the City.
50. The policy identifies the importance of activity centres and seeks enhancement of the identity, sense of place and prosperity of the activity centres so that they encourage people to shop, visit and linger and are a focus for community life (objective 5, P29).
51. This policy is a policy reference at Clause 22.01-6.

City of Casey Activity Centres Strategy (City of Casey, in association with Ratio Consultants Pty Ltd, 2006)

52. The purpose of this policy was to *'provide a clear direction for the development of a highly accessible activity centre system that maximises community benefit.'*
53. The policy includes a list of activity centres within Casey and identifies Eden Rise in the category of 'Neighbourhood Centres, Existing and Proposed'. At this time Eden Rise had been rezoned but was yet to be developed. Neighbourhood centres were identified as exhibiting the following characteristics:
- *Seen to have the potential to grow and accommodate a range of non-retail uses and/or are well established centres*
 - *Have the potential to accommodate increased residential densities around the centres in line with Melbourne 2030.*
 - *Are well located on the public transport networks identified by Melbourne 2030 and Casey 21.*
54. At this time, Berwick Springs mixed use area was identified as a 'proposed convenience centre.' The policy identified four new convenience centres and noted these would be small main street centres with linkages to nearby residential areas.
55. The policy was given effect in the Casey Planning Scheme's retail policy at Clause 22.01 and is a policy reference at Clause 22.01-6.

Activities Areas and Non-Residential Uses Strategy, 2012

56. This report was a review and update of the 2006 Casey Activity Centres Strategy. The purpose of the Strategy was *'to provide clear direction for the location and design of all non-residential uses and development across the municipality focussing on the development of a highly accessible and robust Activities Area system that maximises community benefit.'* (P.4)
57. This document identified Eden Rise as a Large Neighbourhood Activity Centre. Berwick Springs mixed use area is not identified as an activity centre however, I note the following at Table 1, page 25,
- 'In the Berwick South /Eden Rise Large Neighbourhood Activities Area, a small supermarket and associated speciality is supported (no more than 2000m2 GLFA) on land known as Unit 2/248-296 Clyde Road Berwick subject to an appropriate Structure Plan being prepared. A rezoning of the land must be facilitated to allow any retail uses on the site. The Structure Plan must include this land and surrounds, including the Eden Rise Shopping Centre, the tavern at 288-296 Clyde Road and other properties fronting Clyde Road. Any increase in retail floor space on land known as Unit 2/248-296 Clyde Road Berwick is also subject to an appropriate retail demand study being approved by Council.'*
58. The policy was adopted by Council but not given effect in the Casey Planning Scheme.

PLAN MELBOURNE 2017-2050 (2017)

59. Plan Melbourne seeks to guide the growth of the city for the next 35 years by setting out the Strategy for supporting jobs, housing and transport by building on liveability and sustainability.
60. Policy 1.2.1 seeks to 'support the development of a network of activity centres linked by transport.' Fountain Gate-Narre Warren is identified within the document as a Metropolitan Activity Centre and the document notes that these centres are 'supported by a network of major and neighbourhood activity centres of varying size, role and function.'
61. Policy 5.2 seeks to 'support a network of vibrant neighbourhood activity centres'. Structure plans are supported to assist in the delivery of 20-minute neighbourhoods.

PLAN MELBOURNE (ADDENDUM 2019)

62. The Plan Melbourne Addendum updates Plan Melbourne with population and employment figures and includes additional information on industrial and commercial land requirements. The document also seeks to further imbed the '20-minute neighbourhood concept'.

ASSESSMENT

63. The nomination of Berwick Springs mixed use area as an existing activity centre, its proposed co-location with Eden Rise and the 'aspiration' of both centres to be a Major Activity Centre does not appear to be strategically justified.
64. Berwick Springs mixed use area is a relatively large land holding which extends in a linear form along Clyde Road between Greaves Road to Homestead Road. It is diagonally opposite the Eden Rise Shopping Centre. Existing policy identifies the Eden Rise Shopping Centre as a Neighbourhood Activity Centre while Berwick Springs mixed use area does not have an activity centre status.
65. Berwick Springs mixed use area has developed over time with a series of non-residential uses which can be contemplated within the residential zone. There is an undeveloped parcel at the western end of the site with the remainder of the land developed with an agglomeration of stand-alone uses, which include:
 - Zagame's Berwick Hotel, drive through bottle shop and pokies venue at the north-western corner of Greaves Road and Clyde Road. It is located centrally within a large carpark and the land to the west is undeveloped
 - A single storey building containing a radiology centre, gym and takeaway premises
 - BP service station
 - A part single, part two storey building containing a number of takeaway outlets and office uses, with car parking around the edges
 - Additional takeaway and drive through venues and associated carparking which continue to (and beyond) Homestead Road
 - A child care centre accessed from Homestead Road
66. Amendment C258 seeks to alter the activity centre hierarchy by describing Berwick Springs mixed use area as an existing activity centre. This is at odds with the existing policy position. The existing policy at Clause 22.01 identifies the Metropolitan, Major, Neighbourhood and Convenience centres for the municipality. While Eden Rise is identified as a Neighbourhood Activity Centre, Berwick Springs mixed use area is not nominated, even in the 'convenience centre' category, which is the lowest category in the hierarchy.
67. The City of Casey Activity Centre Strategy 2019 defines activity centres as,

'Areas that provide a focus for services, employment, housing, transport, and social interaction. They range in size and intensity of use from smaller neighbourhood centres to major suburban centres and larger metropolitan centres.'
68. The Strategy also alters the activity centre categories to Metropolitan, Major, Medium Neighbourhood and Local Neighbourhood, as well as Health and Education and Restricted Retail Precincts. Berwick Springs mixed use area is proposed to be nominated as a Medium Neighbourhood Activity Centre. These centres are defined as,

'Centres that provide access to local goods, services, and employment opportunities and serve the needs of the surrounding community. They are dominated by small businesses. They are accessible to a viable user population by walking/cycling, have access to at least some local bus services, and provide an important community focal point for a range of community, educational, health and recreational needs.' (Page 3)
69. The Activity Centre Hierarchy identifies these centres as having a non-residential floor space which ranges between 5,000 to 20,000 sqm and describes the character and function as
 - *Provides for day-to-day and weekly retail and service needs at a neighbourhood level*
 - *Strong focus on supermarkets, with a mix of full-line and small format supermarkets and medium density housing, or high density housing where the centre is Aspiring to Major.*

- *A medium focus on specialty retail and hospitality uses*
 - *Higher focus on retail uses where the centre has been identified as Aspiring to Major.*
 - *A medium focus on commercial uses*
 - *Approximately 25 per cent non-retail commercial and community uses floor area for the whole of the centre*
 - *Most building heights of at least two storeys.*
70. Berwick Springs mixed use area does not meet the characteristics and function identified for a Medium Neighbourhood Activity Centre as outlined in the policy.
71. The Activity Centre Strategy defines Local Neighbourhood Centres, which sit below Major Neighbourhood Centres in the hierarchy as:
- ‘...Centres that provide access to local goods, services, and employment opportunities and serve the needs of the surrounding community. They are dominated by small businesses. They are accessible to a viable user population by walking/cycling, have access to at least some local bus services, and provide an important community focal point for a range of community, educational, health and recreational needs.’ (Page 3)*
72. The identified characteristics and function of Local Neighbourhood Centres are described as centres which,
- *Provides for day-to-day and weekly retail and service needs at a neighbourhood level*
 - *Small format supermarket*
 - *Some specialty retail and hospitality uses*
 - *Some commercial uses*
 - *Focus on convenience retailing and medium density residential uses*
 - *Approximately 25 per cent non-retail commercial and community uses floor area for the whole of the centre.*
73. Berwick Springs mixed use area does not meet the threshold definition of a Local Neighbourhood Centre and certainly not the definition of a Medium Neighbourhood Centre. There is a notable absence of retail land uses, absence of a supermarket and inability for the centre to provide for the day to day and weekly retail needs of the neighbourhood. I consider Berwick Springs mixed use area is consistent with the definition of an out-of-centre location, defined in the Activity Centres Strategy as *‘any site for a proposed non-residential land use which is located outside of a designated activity centre’* (page 3).
74. It seems curious given the nature of the land uses and their identification as out of centre uses in the background strategic work undertaken by SGS that Berwick Springs mixed use area has been elevated to a Neighbourhood Activity Centre. There appears to be no empiric or strategic justification for this change in policy designation.
75. Amendment C258 also proposes that Berwick Springs mixed use area and Eden Rise be amalgamated as a Medium Neighbourhood Activity Centre, with the potential for elevation into Major Activity Centre. The two background documents which support the Activity Centres Strategy do not provide the strategic justification for the co-location of two centres. Rather, in the 2017 report, *‘Casey Activity Centres: Retail and Other Employment Floorspace Assessment by SGS’*, there was a recommendation that this area,
- ‘should be reviewed holistically and a long term plan to integrate the two centres and apply an appropriate zone(s) over the area should be investigated.’*
76. As previously outlined, Action 7 of the City of Casey Activity Centres Strategy Action Plan 2019, which seeks to give effect to the Activity Centre Strategy, is to apply a Comprehensive Development Zone (CDZ) to Berwick Springs mixed use area with *‘an incorporated plan that ensures a street-based high-quality design’*. Action 7 has a ‘high’ priority.

77. This seems on its face to be inconsistent and a significant leap in policy terms. Whilst there has been some reference to Berwick Springs mixed use area over time either being or becoming an activity centre of some type, there does not appear to have been a rigorous review of retail demand/need, structure planning or indeed what form of zone is appropriate. It leads me to the conclusion that the strategic case for it being an activity centre is somewhat ad hoc and inconsistent.
78. The policy requirement for integration of the two centres without appropriate review and the development of a long term plan is premature and strategically unsound. Without pre-empting this work, I am of the view that once undertaken it would likely demonstrate significant impediments to achieving the outcome sought, noting:
- The two centres are physically dislocated from each other, being on diagonally opposite sides of a major intersection.
 - It will be difficult to achieve a permeable and legible urban structure for the two centres which promotes pedestrian connections. Clyde Road is a major arterial road which, along with Greaves/O'Shea Road carries significant volumes of traffic and creates a significant impediment for pedestrian integration of the centres.
 - The existing layout and development at Berwick Springs mixed use area is disparate and disjointed, which reflects not only its incremental growth over time, but its development as a road based convenience centre, rather than a traditional neighbourhood centre.
 - The undeveloped parcels at Berwick Springs mixed use area are at the western end of the site and remote from the Eden Rise Centre, further diminishing the potential for good pedestrian connectivity and integration.
 - Achievement of the outcomes sought under the Urban Design Guidelines for Activity Centres would be difficult. I note these relate to structure, movement, public transport integration, built form and public realm outcomes.
79. The introduction of retail uses to Berwick Springs mixed use area also has the potential to fragment and diminish the operation and role of Eden Rise. Eden Rise currently comprises 13,800 sqm of retail floor space, anchored by Coles and Aldi with 47 specialties and two pad sites to the Clyde Road frontage. At this size, it fits well within the 5,000 to 20,000 sqm retail floor space range for a Medium Neighbourhood Activity Centre and in terms of the role and uses, it is consistent with the characterisation of these centres.
80. Additionally, I understand that there is capacity within the Eden Rise Centre for further development and expansion. In this regard I note there is currently a Section 72 request with Council for modifications to Planning Permit Pln00992/08.B for refurbishment of the existing shopping centre, including the addition of a third supermarket and retail tenancies along with rearrangements to the existing car park and accessways.
81. The above demonstrates that Eden Rise is appropriately designated a Medium Neighbourhood Activity Centre and can continue to accommodate additional retail floor space consistent with its designation without the need to incorporate the Berwick Springs mixed use area landholding.
82. Certainly, it would be a poor outcome if the retail floor offer was fragmented and such a result could potentially undermine or weaken the Eden Rise centre.
83. The dislocation of retail facilities across two sites would also diminish the experience for consumers with reduced accessibility and convenience for users of the centre. Accordingly, it is my view, the continued development and expansion of the Eden Rise Centre is preferable to a co-location with Berwick Springs mixed use area. Development and expansion at Eden Rise can occur in an integrated and connected manner. The appropriate role for Berwick Springs mixed use area is as a complementary area potentially including employment generating uses, rather than retail land uses.
84. Given the above, the designation of Berwick Springs mixed use area as a Neighbourhood Activity Centre consolidating with Eden Rise to eventually become a Major activity centre appears unjustified and unlikely.

CONCLUSION

85. In conclusion, I consider that significant caution should be exercised in the approval of Amendment C258 to the Casey Planning Scheme (in its current form) given:

- There seems to be no strategic justification for the designation of Berwick Springs mixed use area as an existing Medium Neighbourhood Activity Centre with the potential to become a Major Activity Centre in combination with Eden Rise.
- There are significant impediments to the co-location of Eden Rise and Berwick Springs mixed use area as a Medium Neighbourhood Activity Centre which have not been considered and which will inhibit the effective integration of the two centres.
- The elevation of the Berwick Springs mixed use area has the potential to diminish the retail performance of Eden Rise and undermine the integrity of the hierarchy of the wider Municipality.

86. On this basis, it is my recommendation that the amendment documentation be altered to remove reference to Berwick Springs mixed use area as an activity centre.

APPENDIX A

**STATEMENT OF QUALIFICATIONS AND
EXPERIENCE**

NAME AND ADDRESS

Stuart Andrew McGurn
Director
Urbis Pty Ltd
Level 12, 120 Collins Street
MELBOURNE VIC 3000

QUALIFICATIONS

- Bachelor of Arts 1984
- Graduate Diploma Urban Planning 1986

PROFESSIONAL EXPERIENCE

- Current Position: Director, Urbis Pty Ltd
- 2010-2015: Partner, Environmental Resources Management Australia Pty Ltd
- 1998 – 2010: Director, Fulcrum Town Planners Pty Ltd
- 1986 – 1998: Town Planner in local government – Cities of Broadmeadows and Melbourne, including role as Principal Planner – City of Melbourne

AREA OF EXPERTISE

- Statutory planning for local and state government on a range of residential, commercial and industrial issues.
- Consulting advice to a wide range of commercial and local government clients addressing the management of urban development and the statutory planning process.
- Extensive planning advice to architects, project managers and other professionals involved in a range of projects and the built form and visual impact issues associated with the development of land.

EXPERTISE TO PREPARE THIS REPORT

Professional qualifications and expertise in town planning both in the public and private sectors.

INSTRUCTIONS WHICH DEFINED THE SCOPE OF THE REPORT

My instructions required me to undertake a town planning assessment and site review of Amendment C258 to the Casey Planning Scheme. In so doing, I have relied upon those matters set down below.

FACTS, MATTERS AND ASSUMPTIONS RELIED UPON

I have relied upon the following in the preparation of this report:

- Inspection of the subject site and surrounds.
- Review of the Casey Planning Schemes, exhibited amendments, and strategic policies.
- Documents as described in the Introduction to my Statement.

DOCUMENTS TAKEN INTO ACCOUNT

- Relevant documents are described above.

IDENTITY OF PERSONS UNDERTAKING THE WORK

- Stuart McGurn assisted by Rebecca West, Director.

SUMMARY OF OPINIONS

A summary of my opinions in relation to this matter is included at paragraph No. 78 of this evidence.

I have made all the inquiries that I believe are desirable and appropriate and no matters of significance which I regard as relevant have to my knowledge been withheld from the Panel.



Stuart McGurn
Urbis Pty Ltd

