



**LEVEL 12  
120 COLLINS STREET  
MELBOURNE VIC 3000**

URBIS.COM.AU  
Urbis Pty Ltd  
ABN 50 105 256 228

7 October 2019

Mr Morris Edwards  
Senior Planner  
Victorian Planning Authority  
c/- Amendment C106 or Beveridge North West  
Level 25, 35 Collins Street  
Melbourne VIC 3000

Dear Morris,

## **MITCHELL SHIRE PLANNING SCHEME AMENDMENT C106 – SUBMISSION ON BEHALF OF GALILEO GROUP**

### **1. INTRODUCTION**

Thank you for the opportunity to provide a submission to the exhibited Beveridge North West Precinct Structure Plan (PSP).

Urbis acts on behalf of the Galileo Group (Galileo), the owners of land at 565 Old Sydney Road, Beveridge. We are supportive of the Victorian Planning Authority (VPA)'s comprehensive approach to planning for the northern growth corridor, which will unlock opportunities for new communities.

Galileo purchased the Beveridge Foothills site in early 2017 and since this time, has developed a vision for the development of this land, with input from Mitchell Shire Council. Galileo recognises the unique attributes of the site and the opportunities created by its development, which include opening connections to the ridgeline and Deep Creek to benefit the future residents of Beveridge North West and communities to the south.

Whilst the planning for the Beveridge Foothills land still has some way to go, it is important for the Beveridge North West PSP to recognise the site's future redevelopment in some form and embrace the opportunities this will deliver to the precinct.

The plan for the Beveridge North West PSP area needs to include a strong connectivity network to ensure existing and future communities will have efficient access to employment, services and recreation opportunities.

Galileo is generally supportive of the exhibited PSP. Our submission relates to three key areas:

- The importance of upgrading Old Sydney Road to benefit the future residents of the Beveridge North West PSP, and the need for funding to be provided through the Beveridge North West Infrastructure Contribution Plan (ICP).
- The need to future proof the Beveridge North West PSP to reflect future rural residential development west of the PSP and existing development occurring within the corridor both inside and outside the Urban Growth Boundary (UGB).

- The need for the PSP to recognise the redevelopment potential of the Beveridge Foothills land, and the opportunities to connect open space linkages and trail networks through both sites to benefit future residents of the Beveridge North West PSP area.

## 2. SUBJECT SITE

Galileo's site is located at 565 Old Sydney Road Beveridge. It is situated on the western side of Old Sydney Road and has an area of approximately 1,350ha and frontage of over 6km. The location of the site relative to the Beveridge North West precinct is shown in Figure 1. It is just outside the Urban Growth Boundary (UGB) with the Beveridge North West and Beveridge South West precincts situated on the eastern side of this interface. Deep Creek forms the western boundary of the site.

The site is located within the Farming Zone (FZ) and is also affected by the Environmental Significance Overlay (ESO) along Deep Creek, and the Erosion Management Overlay (EMO).

The main site access is from Old Sydney Road. There is a farm maintenance area near the site entrance which comprises two derelict residences, a maintenance shed, metal water tanks and other associated sheds. A significant portion of the site's frontage to Old Sydney Road is unsealed.

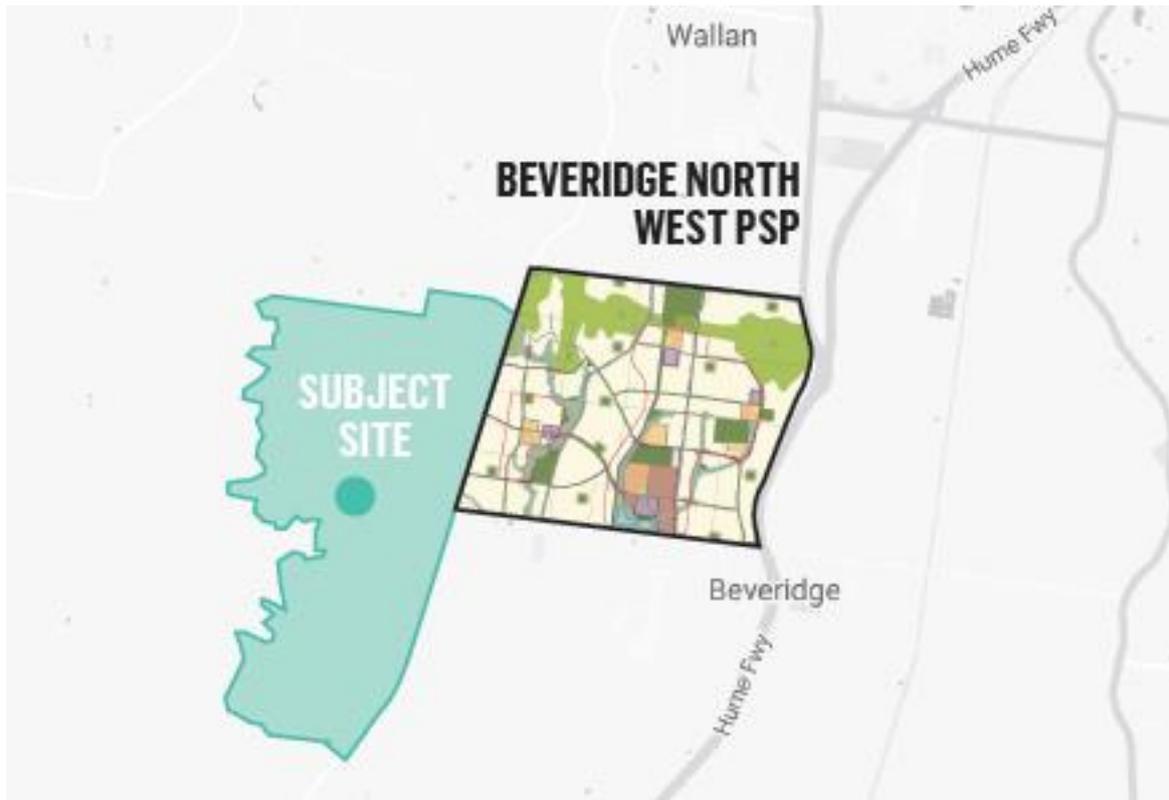


Figure 1: Location of the subject site adjacent to the PSP

### 3. SUBMISSION ITEMS

Galileo is generally supportive of the exhibited PSP. Our submission focuses on the need to:

- Fund the upgrade of Old Sydney Road through the ICP.
- Future proof the PSP in anticipation of rural residential development to the west and planned future development to the north and south (i.e. PSPs in proximity).
- Ensure the PSP recognises the opportunities created by the development of the Beveridge Foothills site, through improving open space linkages and trail networks to the ridgeline and Deep Creek.

Our submission is detailed in the following sections.

#### 3.1. UPGRADE TO OLD SYDNEY ROAD

##### 3.1.1. Exhibited Precinct Structure Plan

The exhibited PSP and associated traffic report remain largely silent on the function and hierarchy of Old Sydney Road.

We understand that the exhibited traffic report entitled, *Strategic Transport Modelling Assessment*, prepared by GTA on behalf of the Victorian Planning Authority (VPA), will be used to:

- *Inform the extent of road infrastructure required to be constructed to support the BNW development for an interim (2031) scenario.*
- *Inform the ultimate lane requirements to enable the construction of final road infrastructure for the ultimate (2046+) scenario.*

The report concluded that “overall, the proposed future (ultimate) road network within BNW PSP will perform at acceptable levels by 2046 based on traffic capacity”.

Despite this conclusion, assumptions and inputs into GTA’s modelling are unclear. It appears the Future Urban Structure assessed by GTA as part of the traffic modelling is different to the exhibited Future Urban Structure. Both plans are included in this submission in Figure 2 and Figure 3. Specifically, differences include the following:

- The plan assessed by GTA only considered one east west connection. The exhibited PSP shows three connections to Old Sydney Road.
- The plan assessed by GTA assumes that Old Sydney Road will be upgraded to a connector whilst the exhibited PSP removes the proposed hierarchy of Old Sydney Road from the plan.



Figure 2: Exhibited Beveridge North West Future Urban Structure (Source: Draft Beveridge North West PSP)



Figure 3: Plan assessed by GTA (Source: Exhibited Strategic Transport Modelling Assessment)

Furthermore, it is unclear whether the traffic assessment has included a high level assessment of likely traffic volumes / capacity along Old Sydney Road in anticipation of future PSP's to be completed to the north and south of the Beveridge North West PSP.

### **3.1.2. What is sought**

The ambiguity and uncertainty surrounding Old Sydney Road requires further investigation. We request that the VPA provide further information and clarification relating to the following:

- Clarify the VPA's intention with Old Sydney Road. Is this road envisaged to be upgraded and are dwellings anticipated to front and have access onto this road?
- Clarify why the proposed hierarchy of Old Sydney Road has been removed from the version assessed in GTA's traffic report as opposed to the exhibited PSP.
- Has there been a high level cumulative traffic impact assessment to determine the likely future traffic volumes along Old Sydney Road? If there has, does it identify road classification and high level design requirements based on the future traffic volumes generated by future PSPs to the north and south?
- Confirmation of the recommended upgrade standard of Old Sydney Road, to ensure adequate distribution of north south traffic into the future.

Should additional investigation result in a requirement to upgrade Old Sydney Road, we submit that the upgrade to Old Sydney Road should be funded by the Beveridge North West ICP.

## **3.2. FUTURE PROOFING THE BEVERIDGE NORTH WEST PSP**

For over two years, Galileo have been engaging with Mitchell Shire Council, the VPA and the Department of Environment Land Water and Planning (DELWP) to present the unique attributes of the Beveridge Foothills site, and Galileo's vision to develop the land for rural residential purposes.

The previous landowner sought for part of the subject land to be included within the Urban Growth Boundary (UGB) during the Logical Inclusions process in 2011. The Logical Inclusions Advisory Committee indicated that they were not opposed to the future development of the land for low-density residential. However, this process would need to occur outside of the Logical Inclusions Process and would be subject to the assessment criteria of a standard Planning Scheme Amendment. They also identified the need for further investigations to determine the suitability of the land for development.

Galileo has worked over the past two years to address the issues raised by the Panel. Detailed site investigations have been undertaken, which have confirmed that the site is suitable for development from an engineering, environmental and servicing perspective. Galileo understands the unique landscape character of the land and they believe the rural character of the site should be enhanced and protected through a sensitive development.

At the time of writing, Mitchell Shire Council is preparing their Rural Land and Activities Review. The purpose of the Rural Land and Activities Review is to provide planning policy, directions and recommendations for rural land within Mitchell Shire. The background paper shows that demand for rural living appears to be increasing and is likely to gain pace as the population grows. It also outlined the various opportunities and constraints faced by rural land in the Shire. Galileo's site is identified as



having low agricultural capacity and lower rainfall in comparison to other parts of the Shire, making it less viable for agricultural uses. This has also been confirmed by Galileo's own site investigations.

In-line with Council's comments, a Housing Needs Analysis was prepared by Urbis' Property Economics and Research team. It investigated the housing needs for rural/semi-rural dwellings within the Shire of Mitchell and the Northern Growth Corridor. This analysis was prepared in January 2019 and largely reflects the conclusions of Council's Opportunities and Constraints paper. Galileo's site was found to be favourable to future rezoning (and not for agricultural uses), as it was relatively close to employment nodes, amenity, has access to major arterial roads and public transport infrastructure, and future services and facilities which will be delivered in the approved Beveridge Central Precinct Structure Plan (PSP) and the future Beveridge North West (PSP) areas.

Galileo have been advocating for the identification of this site to accommodate rural living in Mitchell Shire, and for the site to be rezoned from Farming to a suitable zone. Urbis have been engaging with Council (and other authorities) to progress Galileo's intention. A chronology of our engagement with various authorities to-date include the following. We would be pleased to provide a copy of any correspondence upon request.

Date	Description
28 November 2017	Letter from Urbis to Council providing an overview of Galileo Group's vision for the site.
22 January 2018	Letter from Council outlining the need for further investigations to form part of any potential development to the land but agree there is merit in the rezoning of the Beveridge Foothills site.
5 February 2018	Urbis briefed Councillors regarding future rural lifestyle development opportunities on the Beveridge Foothills site.
March 2018	Galileo engages consultants (heritage, hydrology, environment, hydrology) to undertake initial studies.
4 May 2018	Presentation to Registered Aboriginal Party providing an overview of Galileo Group's vision for the site.
7 May 2018	Letter from Urbis to the Victorian Planning Authority providing an overview of Galileo Group's vision for the site.
9 May 2018	Presentation to the VPA to discuss Galileo Group's vision for the site
14 May 2018	Presentation to DELWP to reiterate interest in proceeding with a rezoning, Galileo's vision for the site, and key opportunities
13 August 2018	Presentation to Council outlining summary of site investigations
20 August 2018	Presentation to Councillors outlining the history, outcomes of site investigations, Galileo's vision and the potential opportunities that can be created following the rezoning.
29 August 2018	Presentation to DELWP and VPA providing information on preliminary site investigations, key findings and Galileo's ongoing work program.



30 August 2018	Letter from Urbis to Council confirming the intention to rezone the Beveridge Foothills site to facilitate large rural development.
7 November 2018	Letter from Council providing in principle support for the rezoning subject to the outcomes of Council's Rural Land Activities Review
8 January 2019	Urbis meets with the Department Environment Land Water and Planning (DELWP) to discuss DELWP's position on rezoning. DELWP confirmed support for the rezoning of the Beveridge Foothills site would be subject to the outcome of Council's Rural Land Activities Review
15 January 2019	Letter from Urbis to Council providing an update on Urbis's review of Housing Need in the Mitchell Shire and update on conversations with DELWP
6 June 2019	Galileo conducts a tour of the subject site for Council officers. In attendance were representatives from Council's Planning, Environments, and Open Space departments.
9 September 2019	Urbis submitted a response to Council's to Council's Rural Land and Activities Review: Issues and Opportunities Paper.

As mentioned above, Galileo commissioned significant studies to understand the development capability of the land for rural development. The outcome of these reviews have been provided to Council. The table below provides a summary of all consultant inputs to-date and demonstrates the ongoing commitment to develop the land for rural residential purposes. Copies of these background assessments can be provided upon request.

Reports	Comments and recommendations
Mitchell Shire Housing Needs Analysis	<ul style="list-style-type: none"> <li>• A Housing Needs Analysis investigated the housing needs for rural/semi-rural dwellings within the Shire of Mitchell and the Northern Growth Corridor</li> <li>• Forecast population growth was assessed alongside future dwelling capacity in both the Shire of Mitchell and the Northern Growth Corridor and it was found that in the year 2036 Mitchell Shire Council could have a 1,700 dwelling shortage.</li> <li>• The analysis of current land supply within the Shire of Mitchell found that the quantity of land zoned as rural living/low density residential was minimal despite the Shire accounting for 14% of house sales above 1,000 sqm within the Northern Growth Corridor.</li> <li>• Urbis evaluated several strategic sites across the municipality to understand their relative merit and capacity to deliver low density residential and rural living developments.</li> <li>• 565 Old Sydney Road was found to be favourable to future rezoning, as it benefited from good connections to infrastructure, employment and services and facilities (due to it's direct interface with planned growth areas).</li> </ul>
Biodiversity	<ul style="list-style-type: none"> <li>• The majority of the site has long since been grazed by stock</li> <li>• In total, 44 broad patches of native vegetation were recorded in the study area</li> </ul>

	<ul style="list-style-type: none"> <li>• No listed threatened ecological communities were recorded in the study area.</li> <li>• One listed threatened species, Matted Flax Lily was recorded on the northern boundary of the subject site</li> </ul>
Arboricultural	<ul style="list-style-type: none"> <li>• Approximately 13,000 trees on site</li> <li>• The main body of the site is has low or no constraints from an Arboricultural perspective</li> <li>• Trees along Deep Creek are recommended to be retained</li> <li>• Additional examination of identified threatened species may be required</li> </ul>
Aboriginal Cultural Heritage	<ul style="list-style-type: none"> <li>• No places are registered on the Victorian Aboriginal Heritage Register within the site.</li> <li>• Areas of high or moderate sensitivity are mainly located along Deep Creek</li> </ul>
Non-indigenous Cultural Heritage	<ul style="list-style-type: none"> <li>• No European heritage registered within the site.</li> <li>• Three historical features found; ruins of a stone structure and two mine shafts</li> </ul>
Bushfire	<ul style="list-style-type: none"> <li>• Land is not one of extreme bushfire risk that would preclude development.</li> <li>• Classified vegetation (deemed hazardous including woodland and grassland) along Deep Creek, areas of woodland in SW and NE, and grassland adjacent to north, south and west boundaries.</li> <li>• Strategies to protect and prioritise human life can be appropriately implemented by ensuring BAL-12.5 construction standards achieved (achieving setbacks from buildings to unmanaged vegetation).</li> </ul>
Stormwater and Drainage	<ul style="list-style-type: none"> <li>• Three catchment areas defined; northern, eastern &amp; western.</li> <li>• Northern catchment incorporates steep ridgeline and assumes no development.</li> <li>• Eastern catchment split into 5 separate area.</li> <li>• Western catchment split into 12 separate areas.</li> <li>• Stormwater and drainage can be appropriately managed in both catchments.</li> <li>• Recommended 50m setback from the top of banks of Deep Creek</li> </ul>
Land Capability	<ul style="list-style-type: none"> <li>• Septic Tank Effluent Pump and Septic Tank Effluent Gravity (STEP &amp; STEG) system recommended in steeper, western area of site.</li> <li>• Ability of land to cope with sustained wastewater and nutrient loading from multiple septic systems.</li> <li>• Land capability constraint classes provided based on slope, proximity to</li> <li>• surface water &amp; potential for waterlogging; low, moderate and high.</li> <li>• Site is constrained with regard to disposing of wastewater on-site. Standard septic systems not broadly suitable due to steep slopes, erosion potential and poor soils.</li> </ul>

	<ul style="list-style-type: none"> <li>• Constraints not a hindrance to development as connection to sewer available in eastern portion of site and alternative technologies can be employed.</li> </ul>
Site Contamination	<ul style="list-style-type: none"> <li>• Several features identified with a moderate to high potential to cause contamination. Low- high significance constraint areas identified.</li> <li>• Sources with a moderate contamination potential include use of herbicides/pesticides, machinery maintenance, asbestos and former mining.</li> <li>• Two features with a high contamination potential are the Sheep Dip and</li> <li>• Stock Burial Pit areas.</li> </ul>
Hydrology	<ul style="list-style-type: none"> <li>• No groundwater bores on site.</li> <li>• Groundwater used for stock and domestic water supply in area.</li> <li>• Local groundwater flow could discharge to Deep Creek, and on eastern side in a general east or southeast direction.</li> <li>• Low risk that development would have a detrimental impact on groundwater quality.</li> <li>• Low risk that groundwater would have an adverse impact on proposed development.</li> </ul>
Salinity	<ul style="list-style-type: none"> <li>• No recorded salinity areas identified on Victoria's Salinity Provinces mapping, and minor areas along Deep Creek mapped as indication of potential salinity issues.</li> <li>• Spiny rush and waterlogging indicator plants noted surrounding dams, along some hillslopes, in gully/drainage lines.</li> <li>• Salinity unlikely to be major constraint; may present a low to moderate constraint on foundations or sub-surface infrastructure.</li> </ul>
Geotechnical	<ul style="list-style-type: none"> <li>• Site considered suitable for development but a number of issues and conditions that will influence its development.</li> <li>• Slope Stability – instability in transition slopes between steeper areas and lower lying areas. Creep movement of surface soils and occasional minor landslides evident. (Low constraint to development)</li> <li>• Erosion Susceptibility – some evidence of gully erosion (Low-moderate constraint) and tunnel erosion around lower lying areas. (High constraint).</li> </ul>
Agricultural Assessment	<ul style="list-style-type: none"> <li>• The property is considered to be average to low quality agricultural quality.</li> <li>• Best Management Practice initiatives could achieve a higher sustainable stocking rate and a better farming environment (however not considered viable on a cost benefit basis).</li> </ul>
Transport Assessment	<ul style="list-style-type: none"> <li>• A development of 1,500 to 2,000 lots would generate approximately 15,000-20,000 vehicle movements per day, with 1,500-2,000 in the peak hour.</li> </ul>

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- Anticipated that majority of traffic would travel south (via Cameron's Lane and onto the Hume Freeway), a portion to the east to access local services and a minor amount north.
  - Old Sydney Road has an engineering capacity of approximately 18,000 vehicles per day.
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Whilst we are aware that there is currently no seriously entertained document to strategically support the rezoning of 565 Old Sydney Road at a Council level, the depth of engagement and studies undertaken by Galileo confirms their commitment for a form of rural residential development to occur on this site. The work undertaken also demonstrates the demand and need for additional rural residential land in Mitchell Shire; the locational benefits of the subject site to deliver this form of housing given its interface with future residential communities and services and facilities; and confirms that the site is physically suitable to be developed for rural residential purposes.

### **3.2.1. What is sought**

There is strong commitment to develop the subject site for rural residential purposes. This commitment is underpinned by over two years of ongoing engagement with Mitchell Shire Council, DELWP and the VPA as well as various background reports that outline the site's suitability for rural development.

It is important for planned development in proximity to Galileo's landholding be future-proofed to accommodate a future development of this site. The VPA has an opportunity to forward think how the Beveridge North West PSP can integrate with land outside the UGB, beyond the standard requirement of many PSPs to ambiguously "respond" to the rural landscape interface.

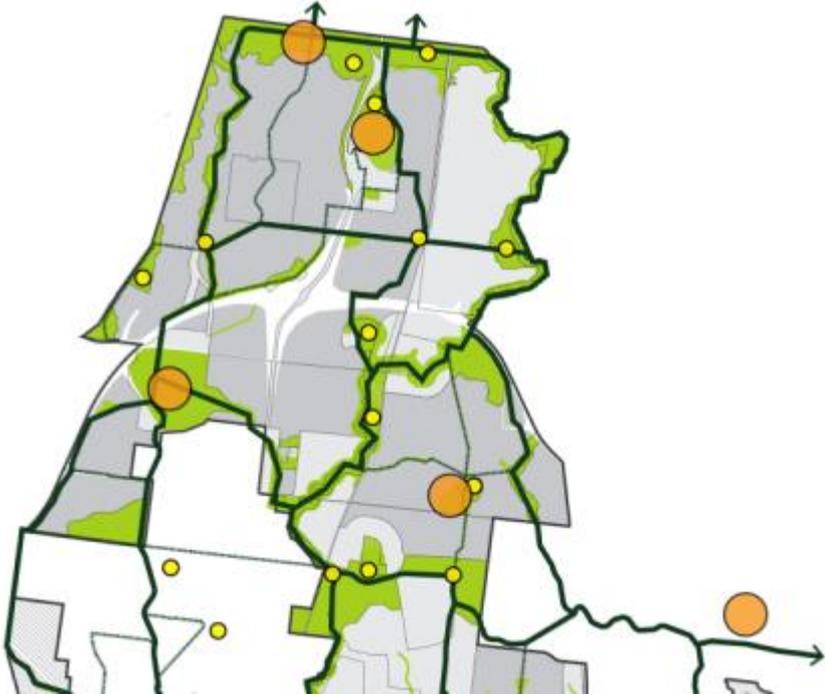
We therefore seek:

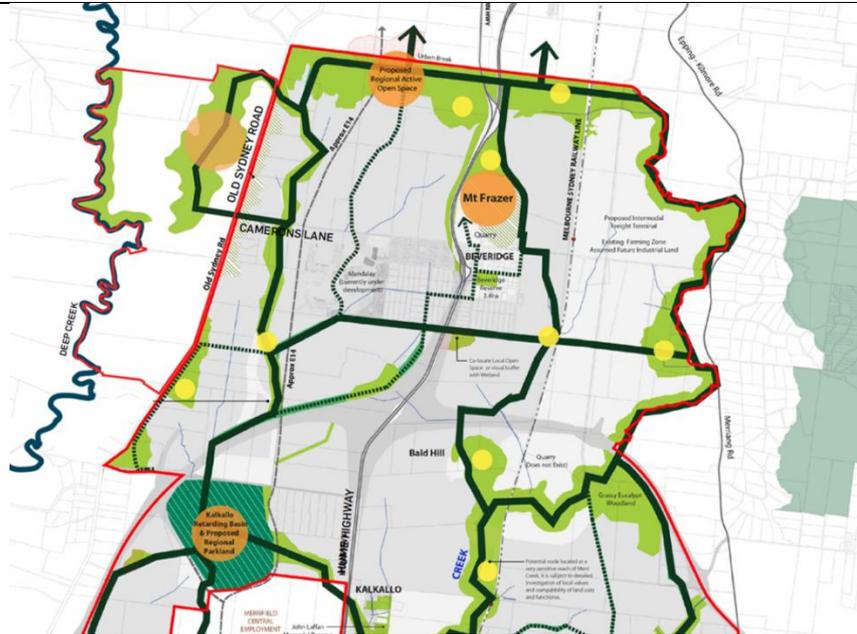
- Specific recommendations from the VPA on how the Beveridge North West PSP will respond to the western rural landscape interface, above what is currently noted in the PSP.

## **4. RECOGNISE OPPORTUNITIES CREATED BY THE BEVERIDGE FOOTHILLS SITE**

As part of the ongoing work undertaken by Galileo to progress the rezoning and ultimate development of the Beveridge Foothills site, Galileo have commissioned the preparation of draft concept plans. The draft concept plans prepared by Urbis seek to open up the site to benefit future residents of the Beveridge North West area, by providing access to future trails and open space networks, the ridgeline and Deep Creek. The development of the site will also provide future residents of Mitchell Shire with access to well-located rural residential housing stock. We recognise that this vision may take some time to be realised, and that the strategic work needs to be undertaken

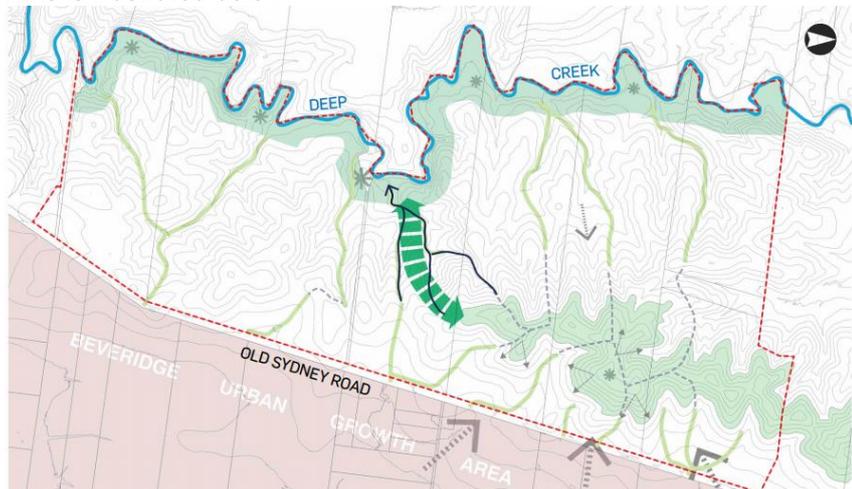
The benefits of rural residential development on Galileo's land have been presented to Mitchell Shire Council at an officer and Councillor level, the DELWP and the VPA. Detailed illustrations of these opportunities are attached in the presentation prepared for DELWP and the VPA. A summary of these benefits are as follows:

Opportunities	Comment
Regional and open space links	<ul style="list-style-type: none"> <li>• The ridge line on the site offers extensive district views extending through to the Melbourne CBD and would be a tremendous public asset if access could be facilitated. There is the potential to link this ridge to the regional network of open space being planned on the eastern side of Old Sydney Road within the Beveridge North West and South West precincts and beyond.</li> <li>• The broader open space network across the Northern Growth Corridor was informed by a document titled Open Space Network Planning for Melbourne's Growth Areas, prepared by Tract Consultants in 2011. This report identifies potential locations for regional parks, linear open space corridors and areas of significant regional landscape character and/or amenity for reservation and protection. The image below shows the plan prepared by Tract.</li> </ul>
	
<p><i>(Source: Tract Consultants April 2011)</i></p>	
	<ul style="list-style-type: none"> <li>• Following a review of the Open Space Network Planning document, Urbis prepared a plan that was presented to DELWP and the VPA showing the potential of seamlessly integrating open space networks within the Beveridge Foothills site to the wider urban area, this plan is depicted below.</li> </ul>



Source: Urbis (August 2018)

- A centrepiece of Galileo’s vision is for the protection and improvement of the ridgeline. Careful viewshed analysis through the site planning stage will ensure that the ridgeline is protected. The intention is for the ridgeline to become accessible to the community, and form part of the broader open space network, consistent with the Council Plan. A concept was prepared showing the potential links is illustrated below:



Source: Urbis (August 2018)

- Allowing lower density housing in this area also provides an opportunity to connect and plan open spaces from Beveridge Central PSP towards 565 Old Sydney Road, providing a biodiversity link towards Deep Creek that has both an ecological and amenity value.

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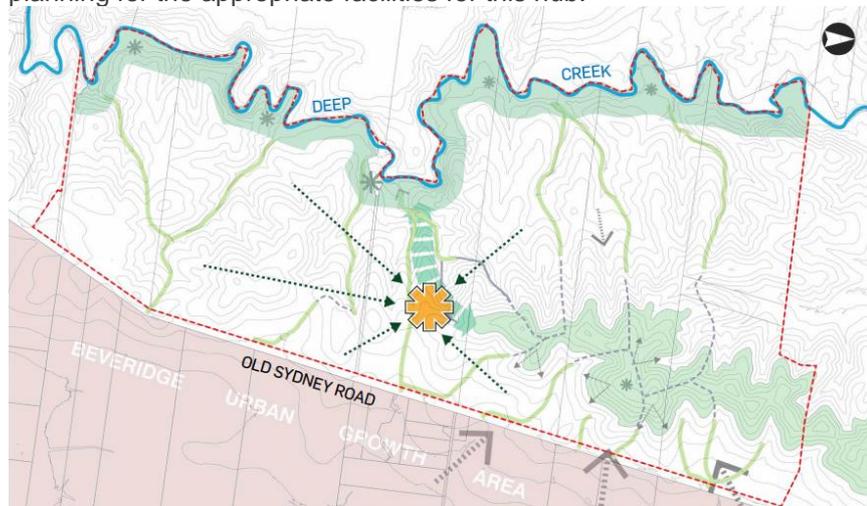
Transition from urban land

- Future low-density residential development has the potential to provide an improved gradual transition from standard density urban land (east of Old Sydney Road) to a more rural style living, with Deep Creek forming a hard edge to inhibit further future residential development westward.

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Community and recreation infrastructure

- We do not expect that the development of the site will warrant the delivery of standalone community and recreation infrastructure. However, our concept plan for the site identifies a location for a potential community hub within the middle of the site. We have confirmed our commitment to work with Council in the planning for the appropriate facilities for this hub.



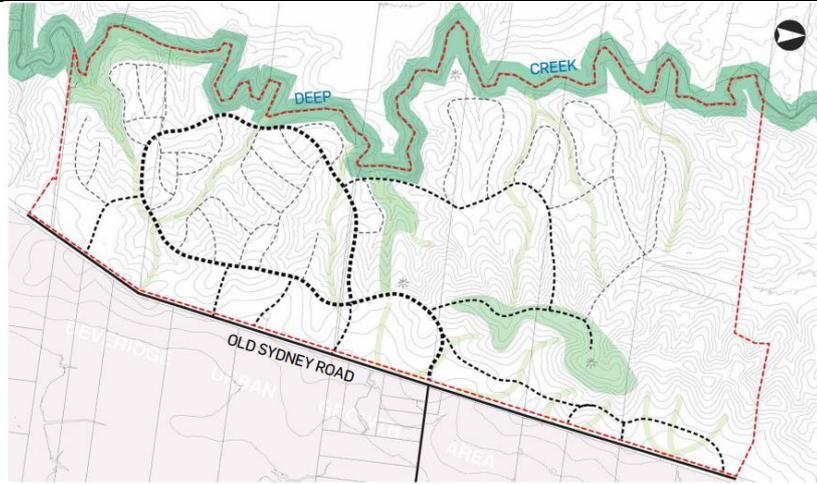
Source: Urbis (August 2018)

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Road links

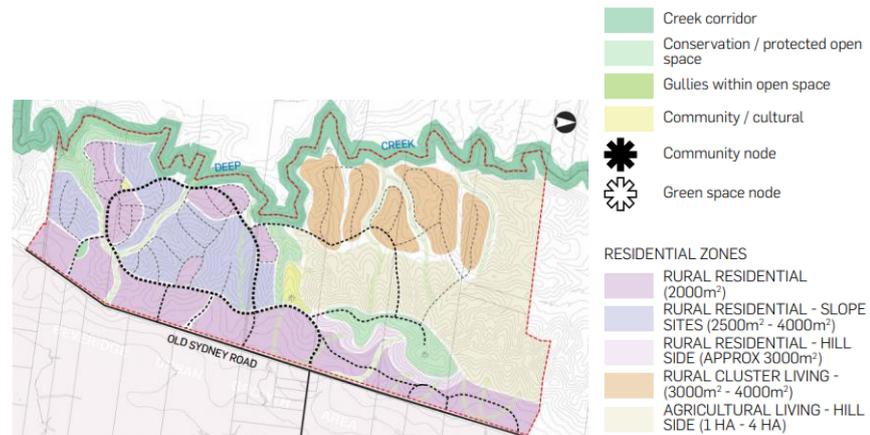
- Whilst a site concept and possible yield is still to be determined, for the purpose of identifying potential traffic/ access implications for the site's redevelopment, a rural residential concept of 1,500 to 2,000 lots was considered.
- This would result in a traffic generation in the order of 15,000 to 20,000 vehicles movements per day or some 1,500 to 2,000 vehicle movements in the peak hour. Based on a generation of 15,000 to 20,000 vehicles per day it is likely that a minimum of 3 site access points would be required to connect with Old Sydney Road, ranging up to 7 site access points depending on the design of road cross sections and intersection treatments. As the exhibited PSP proposes three access points onto Old Sydney Road, these access points are an opportunity to facilitate movement in and out of the PSP area onto Galileo's site.
- A concept of potential road infrastructure, previously presented to DELWP and the VPA is outlined over:

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Source: Urbis (August 2018)

Ecological	<ul style="list-style-type: none"> <li>• Redeveloping the site will present an opportunity to require works to enhance Deep Creek as well as potentially open up the creek to public access as part of a trail network.</li> </ul>
Tourism	<ul style="list-style-type: none"> <li>• The site itself has the ability to deliver equine services, through bridle trails, stabling and other related facilities. We understand that the equine industry is a significant contributor to the economy including the related value adding industries. Should this be an opportunity that Council is interested to explore, we would welcome an open dialogue on how equine services can be integrated into a rural lifestyle.</li> <li>• The promotion of Old Sydney Road as a 'tourism trail' is another opportunity. This has previously been discussed with the Councillors, who are eager to improve Old Sydney Road, and promote its significance as a historic route taken by European explorers. This could include lookouts and rest stops for cyclists and walkers along the roadside, which could occur along the site's 7-kilometre frontage to Old Sydney Road. The recent restaurant and function facility at The Grapevine Estate demonstrates the demand from this sector.</li> </ul>
Variety of housing	<ul style="list-style-type: none"> <li>• Current land supply within the Shire of Mitchell found that the quantity of land zoned as rural living/low density residential was minimal, which inhibits the delivery of this product type into the local area.</li> <li>• Development of Galileo's site would assist in increasing the variety of housing within the municipality. A concept of potential rural / low density housing types are outlined in the image over:</li> </ul>



Source: Urbis (August 2018)

#### 4.1.1. What is sought

We therefore request that the VPA provide further information and clarification relating to the following:

- How will the Beveridge North West PSP respond to the opportunities afforded by the rural land to the west? Although we recognise that there is currently no ‘seriously entertained’ strategic policy to enable rezoning of Galileo’s site, we consider the Beveridge North West PSP should respond in a way that does not prejudice the opportunities afforded by Galileo’s future development, and will maximise opportunities for open space connections to the ridgeline and Deep Creek.

We would be pleased to provide further details of potential design responses to enable integration of Galileo’s landholding with the Beveridge North West PSP.

## 5. CONCLUSION

In summary, Galileo is generally supportive of the exhibited version of the PSP, and specifically the vision and objectives to create a distinct residential community with a strong sense of place.

However, we are of the view that further consideration is required, particularly regarding the role of Old Sydney Road and funding options for the upgrade of this road; and the need to consider the future of land outside the Beveridge North West PSP in the planning of this precinct.

We request a meeting with the VPA to discuss our submission and Galileo’s concept plans in further detail which support our key strategic submission items. Galileo request to be notified and involved in any discussions that may impact upon their landholding following the submission the period and Panel (if required).



Should you have any queries regarding the information contained within, or wish to discuss any aspect of this submission, please don't hesitate to contact Jane Kelly or Noor Syuhada Shamsul on 03 8663 488 or via email at [jkelly@urbis.com.au](mailto:jkelly@urbis.com.au).

Yours sincerely,

A handwritten signature in black ink that reads "Jane Kelly".

Jane Kelly  
Director

Cc: Mr Neil Werrett and Mr Paul Marshall, Galileo Group Pty Ltd  
Mr Colin Madden, RMBL