

27 October 2023

Victorian Planning Authority

Proposed Amendment C274: Officer South PSP – Submission on behalf of Parklea

URPS acts on behalf of Parklea Developments Pty Ltd (**Parklea**) with respect to their landholdings located within the Officer South Precinct Structure Plan area. The following sets out Parklea's formal submission in response to proposed Amendment C274 to the Cardinia Planning Scheme, which seeks to incorporate the draft Officer South Precinct Structure Plan (PSP) and make associated amendments to the Cardinia Planning Scheme.

Parklea controls extensive landholdings in the Officer South precinct (refer to the enclosed plan). Parklea also have significant landholdings located in the Cardinia Road Employment Precinct (CREP) to the east, including active residential and retail developments which directly relate to the future planning of the Officer South precinct.

Parklea generally supports the designation of land uses across the precinct, including the identification of its landholdings as future commercial and industrial land.

The key issues addressed in our submissions are as follows:

- Parklea does not support the proposed Specific Control Overlay and the draft Incorporated Document: "State Infrastructure Officer South Employment Precinct" (September, 2023), as they are not considered lawful in these circumstances, are not strategically justified and are at odds with the objective of delivering employment land for the Cardinia urban growth corridor.
- The draft PSP does not appropriately or adequately respond to the directions of MICLUP, regarding the need for the residential areas of Officer South and CREP to achieve an improved urban land use interface, particularly regarding activity centre planning and the delivery of community infrastructure. The key direction in MICLUP is as follows:

For the Officer South and Cardinia Road Employment PSP areas, proposed place based strategic planning to develop PSPs may require reconfiguring the state-significant industrial precinct. This is to support the establishing community at Cardinia Road to improve connectivity, provide land for schools or community facilities and achieve an improved urban land use interface.

It is submitted that the draft PSP in its current form should be amended in order to achieve the objectives for the interface between the two precincts, as set out above.

- The Officer South PSP must facilitate the delivery of Thompsons Road, including the creation of the road reserve through the precinct and the bridge links across Cardinia Creek to the west and Gum Scrub Creek to the east. The draft amendment in its current form is likely to significantly delay the delivery of Thompsons Road.
- Several items included within the draft Infrastructure Contributions Plan are not strategically justified and have no nexus to the development of the precinct.

Please find attached to this letter:

- A table summarising our detailed submissions to the key issues identified above, and a range of other matters,
- Submissions with respect to the proposed UGZ Schedule,
- Submissions with respect to specific requirements and guidelines set out in the PSP,
- A plan entitled Parklea Owned Land Officer South, prepared by URPS (August, 2023),
- Memorandum of Heritage Advice, 410 Officer South Road, Officer South prepared by Bryce Raworth Pty Ltd (July, 2023),
- Preliminary Advice Regarding Cultural Heritage Obligations (PARCHO) for the Parklea Landholdings, Officer South Employment Precinct Structure Plan (PSP), Officer South, Victoria, prepared by Ecology and Heritage Partners (August, 2023), and
- Officer South Employment PSP Activity Centre Advice, prepared by Ethos Urban (October, 2023).

We look forward to the opportunity to discuss these matters further. Should you have any queries, please contact me on [REDACTED]

Yours sincerely



Paul Beatty
Director

Officer South Precinct Structure Plan – Parklea Submission

Issue/Items	VPA Position	Parklea Submission
State Infrastructure Incorporated Document (proposed SCO)	<ul style="list-style-type: none"> Exhibited material includes an Incorporated Document – State Infrastructure Officer South Employment Precinct (implemented through proposed SCO14). Staging plan triggers relate to provision of both Local (developer) and State Transport Infrastructure Items. All State Road Projects (Grices Road bridge, Thompsons Road bridge over Cardinia Creek and IN13 (Officer South Freeway Interchange Intersection) are identified as long-term projects (defined as 10 years and beyond in the ICP) and would be subject to State government programming and funding. 	<ul style="list-style-type: none"> The proposed SCO and Incorporated Document should be deleted/abandoned as part of the proposed Planning Scheme Amendment. There was no consultation with landowners regarding this document, as part of the PSP 2.0 process. The proposed specific controls are invalid as they are not authorised by, and go beyond the power permitted by, the head clause (clause 45.12). <ul style="list-style-type: none"> There are no 'extraordinary circumstances' with the roll out of the Officer South Employment PSP area. Any extraordinary circumstances have not been demonstrated by the VPA. There are no other staging / timing controls within the Cardinia planning scheme 'that may otherwise apply'. The proposed restriction on staging / timing within the Incorporated Document is beyond power. Standard permit conditions regarding withholding of release of lots / statements of compliance, until the infrastructure to support that development is in place, can operate here. The proposed controls prevent permits being granted, which will not even enable permit applications to be prepared / assessed / referred, etc, which takes months/years. Extreme caution should be exercised in seeking to utilise this sort of tool to regulate development, particularly over a long term. In the absence of extraordinary circumstances, it is inappropriate and could lead to unintended consequences. R58 and R59 / G61 of the draft PSP (without reference to Plan 12) are appropriate and sufficient to enable Council to administer permit applications and impose acceptable permit conditions.

Issue/Items	VPA Position	Parklea Submission
		<ul style="list-style-type: none"> • There are a number of matters within the Incorporated Document that are unworkable and impractical, which will have the effect of stifling development patterns and coordination between landowners/developers, including but not limited to the matters described further below. • If approved, the proposed staging being contingent on <u>delivery</u> of state infrastructure projects is a significant constraint to the logical sequencing of development within the precinct. • The proposed staging of development de-prioritises Thompsons Road delivery, which is the major east-west arterial road through Melbourne's outer-south-east, ultimately linking from Carrum on Port Phillip Bay, to Pakenham. • The report commissioned by the City of Casey and Cardinia Shire Council, entitled <i>Economic Impact Assessment, Thompsons Road Upgrade and Extension</i> (Remplan, August 2022) details the strategic importance of Thompsons Road, and the benefits that can be achieved through its early delivery versus a deferral of this project. The staging plan will have the effect of deferring Thompsons Road beyond 2030, as is assessed in this report. • The staging plan prioritises the development of residential and commercial land ahead of industrial land. This undermines the key objectives of this employment PSP and further delays provision of employment land within the Cardinia corridor. • The staging of development as currently proposed will further exacerbate existing issues in the growth corridor, requiring more local residents to travel outside of the municipality for employment. • Any staging plan adopted for the precinct must provide for flexibility for development to commence where it is required to ensure efficient delivery of required precinct infrastructure. • The proposed staging does not adequately consider the geographic staging of development in the precinct and the impact of the gas easement. We submit that

Issue/Items	VPA Position	Parklea Submission
		<p>land north of the gas easement should have flexibility to commence development, and be developed to the extent that road network capacity is available.</p> <ul style="list-style-type: none"> • There is no relationship between the provision of the Thompsons Road bridge (east) (BR-02) and the development of Stage 3. • Timely and logical provision of downstream drainage infrastructure in the precinct has not been properly considered in the formulation of the staging plan. Land in earlier stages is dependent on downstream land being available for development in later stages. • The development of any residential land in Officer South should not commence until the Centenary Road bridge connection between Officer South and CREP has been constructed. • The restriction on development will prevent ICP funds accruing, and infrastructure items being delivered.
Local Centre Town (LTC), Community Infrastructure Provision	<ul style="list-style-type: none"> • An LTC with as-of-right 2,300sqm is proposed. • The Economic Report released with the Draft PSP sets out a 'standard' approach for providing local retail for a residential area. 	<ul style="list-style-type: none"> • The directions of the Melbourne Industrial and Commercial Land Use Plan (MICLUP) have not been responded to appropriately in the Officer South plan (refer to covering submission). • Key principles of the CREP will be undermined by Officer South as currently planned. The CREP NAC is planned as the hub of the employment corridor, underpinned by the local resident population, and positioned to also service the commercial and employment uses in CREP. <p><i>Local Town Centre</i></p> <ul style="list-style-type: none"> • The proposed LTC is not strategically justified and does not take into account the planned NAC in CREP.

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		<ul style="list-style-type: none"> • Changes to the UGZ and PSP provisions regarding the LTC should be made to allow for a supermarket with a maximum floor area of 500sqm, and total shop floorspace of 1,500sqm in the Officer South LTC (including the supermarket). • This is supported by economic advice prepared by Ethos Urban, which is included in this submission. • The SGS Report is flawed and includes significant errors in catchment mapping included in Figure 25 (page 53). As a result of these errors, the road access and catchment of the planned NAC in CREP is significantly misrepresented and is incorrectly identified as a “gap in the provision of easily accessible local level services”. The error in the mapping in Figure 25 significantly exaggerates any gap in provision of local level services, as it does not accurately reflect the access that will be available to services in CREP for future residents of Officer South. <p><i>Community Infrastructure</i></p> <ul style="list-style-type: none"> • The proposed provision of community infrastructure in Officer South risks undermining the planned community infrastructure in CREP. • The proposed school and active open space should be provided in the Officer South PSP. Community facilities and NAC are currently planned for within CREP and should not be replicated in Officer South. This includes land already acquired by Cardinia Shire in CREP for this purpose (Homestead site). The ASR report is flawed as it only considers the Homestead site for community meeting facilities, whereas it has much greater potential to provide for more community facilities, within the heart of the NAC. • The ASR assessment should therefore be updated to consider the greater potential for community infrastructure provision within CREP, which in turn could reduce the demand for such infrastructure within the Officer South PSP area. The ICP apportionment would also then be adjusted. This would have the benefit of reducing the shortfall in funding community infrastructure due to the capped levy.

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Cardinia Creek Cultural Heritage Investigation Area	<ul style="list-style-type: none"> 200m setback from Cardinia Creek, based on a request from the RAP. This area will not be developable. Quote: <i>The BLCAC have requested a 200-metre conservation zone extending from Cardinia Creek, in line with the statutory areas of sensitivity. A 100-metre conservation zone (Map 3) is considered appropriate to ensure the protection of intangible heritage within direct proximity to Cardinia Creek, to preserve the cultural flows associated with the creek, and provide an opportunity to enhance the cultural landscape through revegetation of the area with Indigenous species. However, the 200-metre conservation zone requested by the BLCAC would ensure greater protection will also allow the creek to meander over time in a natural fashion without concrete reinforcement, it may also permit some forms of recreational use.</i> 	<ul style="list-style-type: none"> A conservation zone (for Cultural Heritage purposes) extending approximately 100m (not 200m) from Cardinia Creek has been recommended in the background report commissioned by the VPA. This conclusion has also been supported by cultural heritage advice from Ecology & Heritage Partners obtained by Parklea (previously provided to VPA). We submit that the proposal to rezone land beyond 100 metres from Cardinia Creek to the RCZ3 is not appropriate. The Cultural Values Assessment commissioned by the VPA does not provide the strategic justification to rezone land to the RCZ3. The draft Amendment documents are inconsistent as the area is identified as an 'investigation area' for this purpose on the one hand (with such investigations not commenced / not completed) while rezoning is proposed on the other hand. It is submitted that orderly planning would place the land within an Urban Growth Zone until such time as the investigations are completed, with any changes to the planning scheme to follow, and be strategically justified by, that further investigatory work. Further, we submit that the CHMP is the appropriate process to properly assess the suitability of this land for development.
Infrastructure Contributions Plan (ICP)	<ul style="list-style-type: none"> Standard rate proposed for Commercial and Industrial land is \$141k per NDHa. Supplementary levy is proposed – additional \$114k per NDHa. 	<ul style="list-style-type: none"> The classification / identification of RD-01 is very ambiguous and will lead to complexities in administration of the ICP. The pedestrian bridges (PB-01 and PB-02) should be removed from the ICP. <ul style="list-style-type: none"> Regarding PB-01: There is a funding gap of over \$11m for PB-01, between the proposed ICP and the Minta Farm ICP (which lies within Casey City

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	<ul style="list-style-type: none"> • Total: \$255k per NDHa. 	<p>Council's administration). From Minta Farm, this pedestrian bridge heads into an industrial area. There are walking trails either side of the creek which will enable access to the future road and path connection to the south of PB-01 (Lecky Road).</p> <ul style="list-style-type: none"> – Regarding PB-02: the bridge caters to a small catchment (on both the Precinct side and the CREP side) only. There are walking trails either side of the creek which will enable access to the future road and path connection to the south of PB-02 (Centenary Boulevard extension). – Per the ICP Ministerial Guidelines, these PBs have not been demonstrated to be infrastructure 'essential to the development of the ICP plan area'. • The apportionment for the community facility CI-01 should be adjusted. <ul style="list-style-type: none"> – As noted above, the ASR assessment should be updated to consider the significant community facility potential planned for the CREP NAC (Homestead site), the land for which is already in Council ownership. Based on this revised assessment, the extent of community facilities within Officer South should be adjusted, and the apportionment also adjusted. – Notwithstanding the above, at the moment, the ASR report indicates that demand for the Officer South PSP facility is 0.6 to the Precinct and 0.7 to the CREP. In percentage terms, this equates to 46% apportioned to the ICP/Precinct (rather than 34%) and 54% to CREP (rather than 66%). The ICP apportionment should be adjusted accordingly.
Thompsons Road Reservation and PAO	<ul style="list-style-type: none"> • Proposed 70 metre road reserve for Thompsons Road, comprising the standard 41 metre arterial road cross section plus additional 14.5 metre wide batters to either side. 	<ul style="list-style-type: none"> • The cross section included in the PSP for Thompsons should be amended to be consistent with that shown in the adjoining PSPs to the west, being Cardinia Creek South PSP. • The Cardinia Creek South and CREPSP (adjoining Officer South to the east) include a 41-metre road reserve and a 40-metre road reserve for Thompsons

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	<ul style="list-style-type: none"> PAO8 proposed for 29m land take beyond the standard 41m arterial road reservation. 	<p>Road respectively, accommodating 4 or 6 lanes of traffic with a central median, and a 3-metre wide two-way bike/shared path on either side.</p> <ul style="list-style-type: none"> It is anticipated that in the future review of CREPSP, the Thompsons Road cross section will be updated to align with the standard 41 metre arterial road cross section. The proposed PAO8 that provides for a potential future widening of the Thompsons Road reservation should be deleted, and the ultimate width of the road reserve should be confirmed in the Officer South PSP now, as the per the adjoining PSPs, to provide certainty for the future development of adjoining land. A PAO should be included covering the entire length of the Thompsons Road corridor at the ultimate width (being 41 metres), to provide for the acquisition of land to facilitate its early delivery, in the event that the development of land in the precinct will not deliver the road in a timely fashion.
Use of land within Electricity Transmission Easement	<ul style="list-style-type: none"> Concept plan prepared that details use of the easement across the precinct, including cycle path, shared path, equestrian trail, and 10m wide future 'biolink' within the easement. SUZ proposed that provides for use of land for industrial/warehousing, and for drainage infrastructure. 	<ul style="list-style-type: none"> In order to achieve orderly and efficient land use outcomes, land located within the electricity transmission easement should be available for use as drainage where required and included within industrial lots where practical. The concept plan should note this. The proposed SUZ should be suitably flexible to ensure use and development of this land can occur, where it is appropriately justified and as agreed with the relevant authority at the time.
Heritage Extent/Overlay (HO91)	<ul style="list-style-type: none"> The heritage overlay/extent is proposed to be reduced in size. Proposed re-use of heritage precinct for commercial/industrial purposes 	<p><i>Further reduction to the extent of the HO91 (Cardinia Park)</i></p> <ul style="list-style-type: none"> The draft PSP plan proposes a reduced heritage overlay area for HO91 (Cardinia Park). This proposal, along with the supporting report prepared by Benchmark Heritage Management (2020, commissioned by the VPA) has been reviewed by

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	as per sub-precinct concept plan on page 19.	<p>Bryce Raworth and Associates (refer to attached report) who could support an even further reduction of the Heritage Overlay at 410 Officer South Road, in line with the previously submitted plan. The basis for this recommendation is detailed in the attached report.</p> <p><i>Identify the HO area in the PSP as open space (rather than industrial land)</i></p> <ul style="list-style-type: none"> • Cardinia Park heritage precinct at 410 Officer South Road has been identified as an opportunity for adaptive re-use of the heritage buildings and their surrounds. It is proposed that a recreation hub be established in this location, including linkages with the Cardinia Creek corridor to provide access for residents of Cardinia and Casey to this significant environmental asset. This approach would facilitate the redevelopment of the significant heritage buildings for a public use and support the re-establishment of the surrounding gardens. • It is submitted that the adaptive reuse of the heritage precinct at 410 Officer South Road for a community purpose has the potential to provide a significant benefit to residents of the broader region. It is therefore submitted that this land should be included in the Officer South PSP as credited open space, consolidated with the public open space indicated to the north in the current VPA draft plan.
Drainage	<ul style="list-style-type: none"> • Exhibited Officer South Draft Drainage Strategy (as per Melbourne Water) 	<ul style="list-style-type: none"> • Post development flood modelling is required to confirm that a 200m ultimate reservation for Gum Scrub Creek (on both the western and eastern sides) is appropriate. • Further information is required with respect to the 'Stephens waterway' widths, particularly the requirements for a minimum 70 m width through Parklea's landholdings (Properties 32 and 39). • Functional designs, and post-development flood modelling should be undertaken prior to the finalisation of the PSP. This will ensure that there is confidence in the

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		<p>land-estimates utilised within the PSP/ICP, and to enable fill requirements/costs to be more accurately estimated.</p> <ul style="list-style-type: none"> • The Officer South Road reservation drainage corridor should confirm that the eastern side of the road reserve should be utilised if additional width is required. Cross section of this area should be provided, indicating the use of this road reserve for road, sewerage infrastructure and drainage infrastructure. • Any critical downstream infrastructure (diversion pipe or outfall pipe) should be clearly drafted within the land it is proposed, e.g. within the Patterson Road reserve for the RBJ outfall pipe.
Proposed Sewerage Infrastructure	<ul style="list-style-type: none"> • Proposed sewerage infrastructure as per Plan 13 within draft PSP. 	<ul style="list-style-type: none"> • Based on the plan below for the PSP utilities, the entire PSP is to be seweraged to the pump station in the southeast off Patterson Road. • There is a trunk main running along Patterson Road to the new alignment of Officer South Road up to the Princes Freeway. A number of sewer mains then branch out across the PSP from the trunk main. There is a section that shows the trunk and sewer main running parallel however it would be expected that the trunk main would be utilised and sewer main not required. • There needs to be flexibility allowed to enable the trunk and sewer mains to follow waterways and other roads as the staging of the PSP may restrict access for the earlier stages. Initial feedback from Melbourne Water indicates that key components of the drainage scheme will need to be constructed with the first stage of development that could assist with service corridors. • A goal should be to have the ultimate services constructed to avoid the costly installation of temporary works such as temporary pump stations as specified in the notes.

Issue/Items	VPA Position	Parklea Submission
Road Network and Road Cross Sections	<ul style="list-style-type: none"> As Per draft PSP. 	<ul style="list-style-type: none"> The proposed road network and road cross sections should be reviewed to ensure efficient development of industrial and commercial land can occur, and that pedestrian, bicycle and shared paths are not unreasonably duplicated throughout the precinct.

Officer South Precinct Structure Plan – Parklea Submissions regarding Applied Zones

Zone	VPA Proposed Land Use Conditions	Parklea Submissions
Commercial 2	<p>Medical Centre / Indoor Recreation Centre / Restricted Recreation Facility:</p> <p><i>All section 1 uses. Condition:</i></p> <p><i>The location of the use must generally accord with the location of 'local community facilities' in the Officer South Employment Precinct Structure Plan and with the prior written consent of Cardinia Shire Council.</i></p> <p>Education Centre:</p> <p><i>Section 1 use. Condition:</i></p> <p><i>The location of the use must generally accord with the location of 'potential non-government school' in the incorporated Officer South Employment Precinct Structure Plan and with the prior written consent of Cardinia Shire Council.</i></p> <p>Hospital:</p> <p><i>Section 1 use. Condition:</i></p> <p><i>On land identified as 'proposed state government facility' on Plan 3 – Place Based Plan of the incorporated Officer South Employment Precinct Structure Plan.</i></p> <p>Child Care Centre:</p> <p><i>Section 3 – prohibited (where the applied zone is Commercial 2)</i></p> <p>Supermarket:</p> <p><i>Section 2 use, condition:</i></p>	<p>The proposed amendments to the standard provisions of the Commercial 2 Zone are not strategically justified.</p> <p>Making precinct specific amendments, such as those proposed, impact the competitiveness of this land with similarly zoned land in the broader region, which is not subject to the same constraints. This has the potential to impact the viability of subdividing land to bring it to market, delaying private investment and the creation of local jobs.</p> <p>The SGS assessment does not recommend these restrictions. Without any evidence to substantiate these restrictions, they are not strategically justified.</p> <p>MICLUP provides appropriate direction with respect to the zoning of land. There is no basis to restrict the use and development of land uses which are otherwise available for Commercial 2 Zone land, including:</p> <p>Medical Centre (nested under Office):</p> <ul style="list-style-type: none"> • Section 1 use – no conditions <p>Indoor Recreation Facility:</p> <ul style="list-style-type: none"> • Section 2 use – no conditions <p>Restricted Recreation Facility:</p> <ul style="list-style-type: none"> • Section 2 use – no conditions

Zone	VPA Proposed Land Use Conditions	Parklea Submissions
	<p>The leasable floor area must not exceed 500sqm.</p> <p><i>Child Care Centre / Primary School & Secondary School:</i> Section 3 use – prohibited.</p> <p><i>Residential Hotel:</i> Section 3 use – prohibited.</p>	<p><i>Education Centre (including Child care centre):</i></p> <ul style="list-style-type: none"> Section 2 use – no conditions <p><i>Child Care Centre / Primary School & Secondary School (all nested under education):</i></p> <ul style="list-style-type: none"> Section 2 use – no conditions <p><i>Residential Hotel:</i></p> <ul style="list-style-type: none"> Section 2 use – no conditions <p>Accordingly, we submit that the proposed restrictions beyond the standard provisions of the C2Z be deleted, and standard zone provisions should apply, with the exception of the proposed condition to be applied to the use of land for a Supermarket (refer to discussion below with respect to the Commercial 1 Zone).</p>
Industrial 1	<p><i>Restricted retail premises</i></p> <p>Section 3 use – prohibited.</p>	<p>The proposed amendment to the standard Industrial 1 Zone provisions, to prohibit Restricted retail premises is not strategically justified.</p> <p>Making precinct specific amendments, such as those proposed, impact the competitiveness of this land with similarly zoned land in the broader region, which is not subject to the same constraints. This has the potential to impact the viability of subdividing land to bring it to market, delaying private investment and the creation of local jobs.</p> <p>The SGS assessment does not recommend these restrictions. Without any evidence to substantiate these restrictions, they are not strategically justified.</p>

Zone	VPA Proposed Land Use Conditions	Parklea Submissions
		<p>MICLUP provides appropriate direction with respect to the zoning of land. There is no basis to restrict the use and development of land uses which are otherwise available on Industrial 1 Zone land.</p> <p>Accordingly, we submit that the row within the Section 3 table of the draft UGZ Schedule concerning Restricted retail premises where the applied zone is the Industrial 1 Zone be deleted.</p>
Commercial 1	<p>Shop</p> <p><i>Section 1 use. Condition:</i></p> <p>The combined leasable floor area on land identified as 'local town centre' in the incorporated Officer South Employment Precinct Structure Plan must not exceed 2,300 sqm.</p>	<p>Advice prepared by Ethos Urban (included with this submission) recommends that retail floorspace within the Officer South precinct should be limited to ensure no undue impact on the designated Kaduna Park NAC, located within the Cardinia Road Employment Precinct to the east.</p> <p>As detailed within this submission, the report prepared by SGS that seeks to justify the retail floorspace planned within Officer South does not appropriately consider the NAC within the approved CREP.</p> <p>Accordingly, we submit that the references to Supermarket and Shop in Clause 2.3 (Specific provisions – Use of land) within the draft UGZ, where the applied Zone is the Commercial 1 Zone should be as follows:</p> <p>Shop (excluding Supermarket):</p> <ul style="list-style-type: none"> • <i>Section 2 use. Condition:</i> <p><i>The combined leasable floor area on land identified as 'local town centre' in the incorporated Officer South Employment Precinct Structure Plan must not exceed 1,000 sqm.</i></p>

Zone	VPA Proposed Land Use Conditions	Parklea Submissions
		<p>Supermarket:</p> <ul style="list-style-type: none"> Section 2 use. Condition: <p><i>The combined leasable floor area on land identified as 'local town centre' in the incorporated Officer South Employment Precinct Structure Plan must not exceed 500 sqm.</i></p> <p>As a result of these changes, the Application Requirement for a Retail impact assessment to accompany an application to use land for a Shop in a local town centre is redundant, and should be deleted.</p>
Mixed Use	<p>Shop, Supermarket</p> <p>As per standard Mixed Use Zone provisions.</p>	<p>The following requirements should be included in Clause 2.3 of the draft UGZ Schedule, with respect to land where the applied zone is the Mixed Use Zone:</p> <p>Shop (excluding Supermarket):</p> <ul style="list-style-type: none"> Section 2 use. Condition: <p><i>The leasable floor area must not exceed 150 sqm.</i></p> <p>Supermarket:</p> <ul style="list-style-type: none"> Section 2 use. Condition: <p><i>The leasable floor area must not exceed 500 sqm.</i></p>

Officer South Precinct Structure Plan – Parklea Submissions regarding PSP Requirements

Issue/Items	VPA Position	Parklea Submission
2.3 Precinct Snapshot	The precinct proposes to accommodate 5,013 residents (est.) and 1,617 (est.) dwellings.	<ul style="list-style-type: none"> The PSP estimates that 3.1 persons will be accommodated in each household. This estimated household size should be reviewed, given the relatively high-density housing proposed in the precinct, creating smaller dwelling typologies and likely smaller household sizes than the average for urban growth areas.
R1	Industrial uses are to be located where potential amenity impacts are minimised and high levels of access to arterial roads can be achieved through subdivision design.	<ul style="list-style-type: none"> It is submitted that this requirement is redundant, as the proposed zoning of land directs where land uses may locate.
R2	Where cafes, restaurants, convenience shops and convenience restaurants are provided in commercial / mixed use areas, they <u>must</u> front open space, conservation areas and waterways, and arterial road or connector street.	<ul style="list-style-type: none"> This requirement should be amended as follows: <i>Where cafes, restaurants, convenience shops and convenience restaurants are provided in commercial / mixed use areas, they <u>should</u> front open space, conservation areas and waterways, and arterial road or connector street.</i>
G1	Employment sectors are encouraged in commercial and industrial areas at key locations and sub-precincts, as identified in Figure 1 Sub-precinct Concept Plan. Facilities such as the proposed Centre of Excellence are encouraged in commercial / mixed use areas where the sites have high-amenity and are well serviced with access to transport and community facilities.	<ul style="list-style-type: none"> The zoning of land provides clear direction regarding the land uses and development that can occur throughout the precinct. The guidance proposed in Figure 1 Sub-precinct Concept Plan will carry no weight with respect to Section 1 land uses within the Industrial 1 Zone and Commercial 2 Zone, and as such is largely redundant.
G2	Job densities and commercial development within the RSCA and local town centre <u>must be</u> generally in accordance with: <ul style="list-style-type: none"> Table 1: Anticipated employment creation in the precinct 	<ul style="list-style-type: none"> The zoning of land provides clear direction regarding the land uses and development that can occur throughout the precinct.

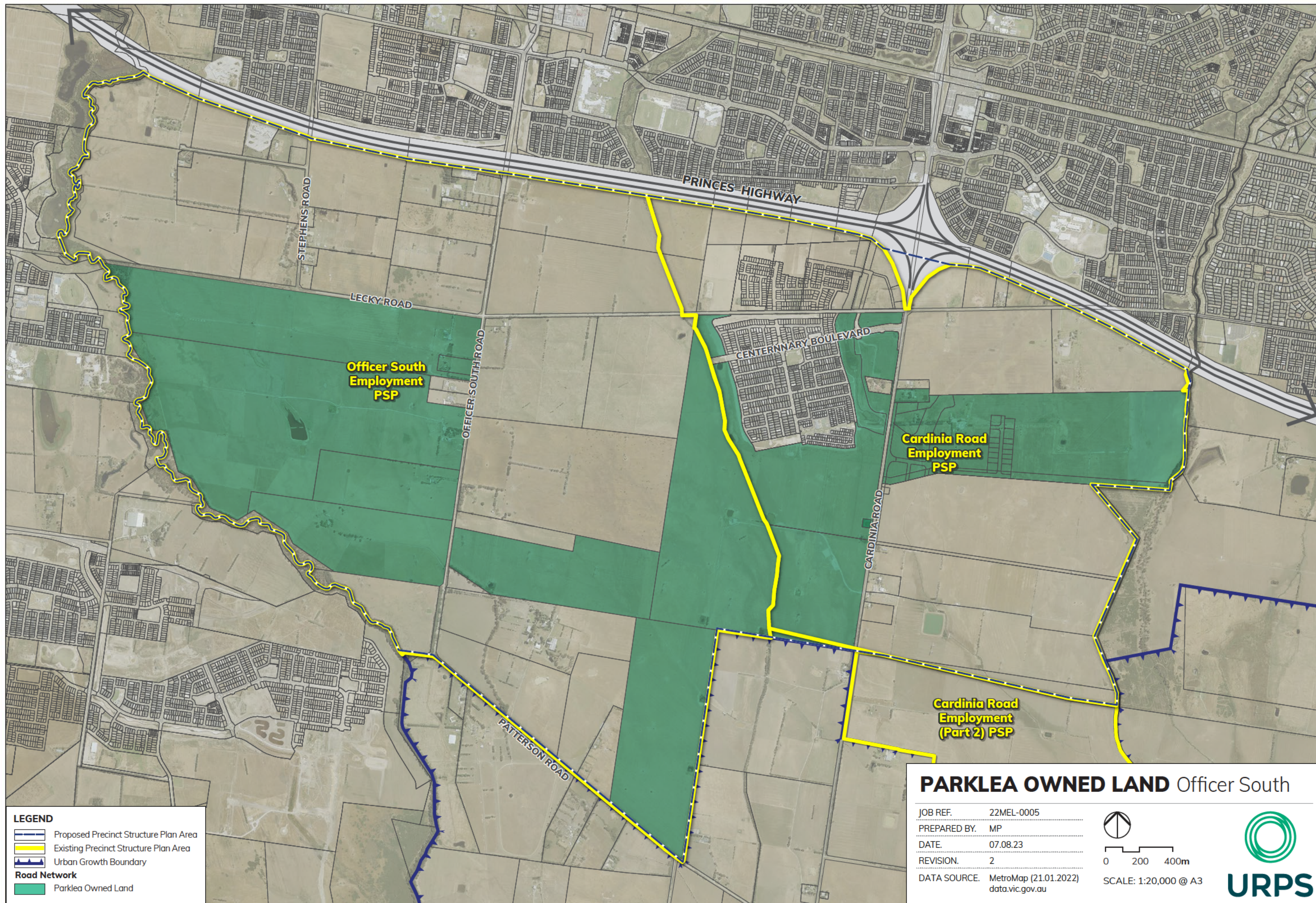
Issue/Items	VPA Position	Parklea Submission
	<ul style="list-style-type: none"> Table 2: Local town centre composition and delivery guide Table 10: Local town centre performance requirements and guidelines <p>and demonstrate how it contributes to the achievement of the minimum job density and the local town centre Design Principles in Appendix 6 Local town centre design criteria.</p>	<ul style="list-style-type: none"> The guidance set out in Table 1 Estimated employment generation will carry no weight with respect to Section 1 land uses Commercial 2 Zone, and as such is largely redundant.
R13	<p>Public pedestrian, equestrian paths, local roads, and infrastructure must be located outside conservation drainage and waterway areas unless shown on Plan 5 Public Transport and Active Paths Network and Plan 13 Utilities Plan. If waterway and conservation crossings are required, they must be planned (and co-located where applicable) to maintain the waterway gully form, drainage function and minimise disturbance to native vegetation and habitat for Growling Grass Frog, Australian Grayling, and Dwarf Galaxias habitat and to the satisfaction of Melbourne Water, Department of Transport and Planning (DTP), Department of Energy, Environment and Climate Action (DEECA) and the responsible authority. Future waterway crossings cannot fill in or block the waterway gully form.</p>	<ul style="list-style-type: none"> This requirement should be amended as follows: <p><i>Public pedestrian, equestrian paths, local roads, and infrastructure <u>should</u> be located outside conservation drainage and waterway areas unless shown on Plan 5 Public Transport and Active Paths Network and Plan 13 Utilities Plan <u>or otherwise approved by the relevant authority</u>. If waterway and conservation crossings are required, they must be planned (and co-located where applicable) to maintain the waterway gully form, drainage function and minimise disturbance to native vegetation and habitat for Growling Grass Frog, Australian Grayling, and Dwarf Galaxias habitat and to the satisfaction of Melbourne Water, Department of Transport and Planning (DTP), Department of Energy, Environment and Climate Action (DEECA) and the responsible authority. Future waterway crossings cannot fill in or block the waterway gully form.</i></p>
R23	<p>A mandatory Cultural Heritage Management Plan is required to be undertaken prior to development occurring within the cultural value investigation area as identified in Plan 3. Interface outcomes with culturally sensitive sites must be delivered in conjunction with the Cultural Heritage Management Plan and in consultation with the BLCAC.</p>	<ul style="list-style-type: none"> The currently drafted R23 goes beyond legislative powers; for example, the Aboriginal Heritage Act 2006 exempts certain types of development from requiring a mandatory CHMP. This requirement should be amended as follows: <p><i>A mandatory Cultural Heritage Management Plan is required to be undertaken prior to development occurring within the cultural value</i></p>

Issue/Items	VPA Position	Parklea Submission
		<p>investigation area as identified in Plan 3 as required by the <u>Aboriginal Heritage Act 2006</u>. Interface outcomes with culturally sensitive sites must be delivered in conjunction with the Cultural Heritage Management Plan and in consultation with the BLCAC.</p>
R27	All conservation areas identified in Plan 7 must be retained in accordance with relevant legislation.	<ul style="list-style-type: none"> • This requirement should be deleted. The requirement is ambiguous. If conservation areas must be retained in accordance with legislation, then they will have to be. R27 does not change this or add anything further.
R34	Stormwater conveyance and treatment must be designed in accordance with the relevant Development Services Scheme or Development Services Strategy, and Plan 9: Integrated Water Management to avoid or mitigate the risk of erosion of sodic and/or dispersive soils, and to appropriately manage flow rate and flow volume, to the satisfaction of Melbourne Water and the responsible authority.	<ul style="list-style-type: none"> • It is noted that the design of drainage corridors includes increased widths (beyond the standard width) in response to concerns regarding erosion. The required widths should be confirmed in the final version of the PSP to provide certainty for the design of future subdivisions.
R35	<p>Potential management methods to avoid or mitigate the risk of erosion of sodic and/or dispersive soils may include but are not limited to:</p> <ul style="list-style-type: none"> • Widening the buffer distances between the core riparian zone and the outside vegetated buffers that allows sufficient tolerances for channel migration • Diversion of water away from sodic and/or dispersive materials • Minimising potential convergence and/or ponding of surface flows • Compacting to reduce pore spaces and minimise water movement through material • Physical and chemical soil ameliorants 	<ul style="list-style-type: none"> • It is noted that the design of drainage corridors includes increased widths (beyond the standard width) in response to concerns regarding erosion. The required widths should be confirmed in the final version of the PSP to provide certainty for the design of future subdivisions.

Issue/Items	VPA Position	Parklea Submission
	<ul style="list-style-type: none"> • Maintenance of topsoil across undisturbed land, preferably with grasses to provide surface soil stability and root anchorage • Minimising the amount of time land is exposed (e.g. by staging development) • Ensuring that culverts and drains excavated into dispersive subsoils are capped with non-dispersive topsoil, gypsum stabilised and vegetated. 	
G22	<p>Subdivision and development surrounding site HO_91 at 410 Officer South Road should consider providing an open space buffer/ public reserve between the northern and western boundaries of the garden. The layout and planting of the open space should aim to preserve the views from the Cardinia Creek homestead to the east. There should be no reduction in the extent of the garden area surrounding the house as it is presently defined.</p>	<ul style="list-style-type: none"> • Refer to previous submissions regarding the HO91.
G35	<p>Additional local convenience centre uses may be located in the designated mixed-use areas adjoining local parks subject to demonstrating that they do not compromise the role and function of the primary local town centre, to the satisfaction of the responsible authority. The ancillary centres are to provide opportunities for activating the local park, such as provision for cafes, small grocer, take-away and home office/small businesses without diminishing the density requirements for that area.</p>	<ul style="list-style-type: none"> • Refer to previous submissions regarding areas where the Mixed Use Zone is proposed to apply.
R56	<p>Utilities and other infrastructure must avoid traversing areas for conservation identified in Plan 7.</p>	<ul style="list-style-type: none"> • It is submitted that this should be amended to read: <i>Utilities and other infrastructure must <u>seek to</u> avoid traversing areas for conservation identified in Plan 7 as much as practicable.</i>

Issue/Items	VPA Position	Parklea Submission
		<ul style="list-style-type: none"> • This will ensure it aligns with R68 (otherwise R56 and R68 conflict with each other).
R58	<p>Development staging must be generally in accordance with Plan 12 (Infrastructure and Staging Plan) and Table 7 (PIP) and must provide for the timely provision and delivery of the following infrastructure to the satisfaction of the responsible authority:</p> <ul style="list-style-type: none"> • Connection to any arterial road network and seek to co-ordinate the delivery of these roads in conjunction with the timing of the arterial road connections located external to the precinct • Connector streets and connector street bridges • Street connections between properties, constructed to the property boundary • On- and off-road pedestrian and bicycle network paths • Safe pedestrian path/s (crushed rock or alternative interim provision where deemed appropriate) from any existing pedestrian network/s to proposed connections to facilitate connectivity to services, transport, community infrastructure and adjoining communities • Drainage infrastructure • Essential infrastructure • Land for community infrastructure, sports fields, local open space including urban agriculture. 	<ul style="list-style-type: none"> • Staging infrastructure plan is not necessary, and should be deleted.
R59	<p>Staging of development must be determined by the development proposals on land within the precinct and the availability of infrastructure services, see reference to Plan 12.</p>	<ul style="list-style-type: none"> • Staging infrastructure plan is not necessary, and should be deleted.

Issue/Items	VPA Position	Parklea Submission
	<p>Development applications must demonstrate how the development will:</p> <ul style="list-style-type: none"> • Integrate with adjoining developments, including the timely provision of roads and connections • Provide for the delivery of community facilities, open space, and amenity to new residents to the satisfaction of the responsible authority • Provide sealed road access to each new allotment • Provide safe pedestrian access to existing pedestrian networks • Deliver any necessary trunk service extensions, including confirmation of the agreed approach and timing by the relevant service provider to the satisfaction of the responsible authority <p>Avoid and minimise impacts to conservation areas with regard to the location of essential and other services to the satisfaction of the responsible authority.</p>	
Other	References to 'Plan 12'.	<ul style="list-style-type: none"> • Plan 12 and all references to Plan 12 throughout the PSP should be deleted. For reasons outlined previously re: the proposed SCO and Incorporated Document.



LEGEND

- Proposed Precinct Structure Plan Area
- Existing Precinct Structure Plan Area
- Urban Growth Boundary

Road Network

- Parklea Owned Land

PARKLEA OWNED LAND Officer South

JOB REF. 22MEL-0005
 PREPARED BY. MP
 DATE. 07.08.23
 REVISION. 2
 DATA SOURCE. MetroMap (21.01.2022)
 data.vic.gov.au

0 200 400m
 SCALE: 1:20,000 @ A3



Memorandum of Heritage Advice

410 Officer South Road, Officer South
11 July 2023

|

Initial consultant heritage advice regarding the Heritage Overlay.

An inspection of the subject site, 410 Officer South Road, Officer and its environs has been undertaken, together with a review of the relevant planning scheme provisions. In particular, the analysis below draws upon a review of the relevant sections of the *Cardinia Planning Scheme* including *Clause 43.01* and *15.03-1S*. We have also reviewed the citation for the subject, site available on the *Victorian Heritage Database*.

410 Officer South Road, Officer, also known as '*Cardinia Park, Former Gin Gin Bean*' is a relatively large, semi rural property. While most of the property comprises farming and grazing land, the place also contains a single storey dwelling, first constructed in the 19th Century, that is set well back from the Officer South Road boundary.

The citation indicates the house was in stages, with the first envelope constructed c.1870. This faces south toward Cardinia Creek and is double fronted, with a rendered finish. The return verandah has a bullnose profile, with timber piers and iron frieze. It is thought the verandah is a later addition as the threshold of the door is above the verandah floor. The rear of the house is understood to have been constructed in the early 20th century. It is of weatherboard and conventional character, with a verandah supported on turned timber posts. The hipped roof is clad in corrugated iron, with three rendered chimneys punctuating the roof. Externally, the dwelling appears to have undergone little change since the citation was produced c.1996. The house is enclosed by a low, non-original fence, with remnant garden to the south. North west of the house are a series of outbuildings and shed, which have not been identified to be of historical significance. The house is accessed via a long driveway, with various introduced mature trees.

Two aerial photos, one from 1975 and one from 1987, indicate that the configuration of the driveway has changed over time. At present the dwelling is accessed via the north, which is the 'rear' of the dwelling, whereas in the past, the driveway swept around the south of the dwelling, i.e., the front and was then configured to continue in a loop.



Figure 1 Aerial photo dated to 1975. It is noted that the driveway at that time looped around the dwelling (indicated by the red arrow) from the south. Canopies of several trees that currently line the driveway appear quite small at this time, indicating they were planted in the second half of the 20th century.
Source: State Library Victoria – Berwick and Pakenham, Department of Crown Lands.



Figure 2 Aerial photo dated to 1987. By this time, the driveway looped around the whole of the homestead. It is noted that many of the canopy trees that lined part of the driveway have since been removed.
Image Source: Landata.

The site is subject to an individual Heritage Overlay, HO91 (Cardinia Park, 410 Officer South Road, Officer). External paint controls apply, however internal alteration controls and tree controls do not. The citation produced for the property in the *Cardinia Shire Heritage Study* (1996), provides a brief description and statement of significance, which are reproduced below:

Physical Description

This house is near or at the site of an old pastoral complex, set on the Cardinia Creek, and well in from the road. The present house was reputedly built in three stages and this matches the physical evidence. The brick front is thought to date from the 1870s, the weatherboard section at the rear from the turn of the century, and the kitchen from the First World War period.

The front section is a typical conservative stuccoed Italianate styled and verandahed villa with a corrugated iron clad hipped roof and Edwardian-era bullnose profile verandah (later). The front threshold is set well above the verandah floor level indicating that it once opened onto a timber verandah which has since been removed. The house has the typical four main rooms either side of a central passage as reflected by the symmetrically arranged double-hung windows facing the front and the cemented ornamental chimneys.

The rear verandah supported on turned timber posts typical of the Edwardian-era and is faced by an altered weatherboard section of the house. There is a huge dome-topped well to one side of the house in the garden which presumably served the kitchen. A reconstructed pleasure garden is at the front of the house with some mature plantings. There is no indication of mature trees which might have lined the long driveway into the house. Well removed from the house are corrugated iron clad out-buildings which appear of more recent construction.

Statement of Significance:

Cardinia Park, the former Gin Gin Bean Pre-emptive Right, is significant to the Cardinia Shire as an early house connected with the pioneering pastoral period in the district and closely related to the later early farming activity on this property. The house is thought to be among the oldest in the shire and this is supported by a reasonably well preserved front wing which is complemented by a later Edwardian-era wing, thus reflecting stages in the Lecky ownership of the property. The Lecky family was associated with this property from a very early date, James Lecky, the pastoralist, holding the Gin Gin Bean lease from 1846.

As the dwelling is subject to a Heritage Overlay, it is subject to the provisions of Clause 43.01, the purpose of which is as follows:

To implement the Municipal Planning Strategy and the Planning Policy Framework.

To conserve and enhance heritage places of natural or cultural significance.

To conserve and enhance those elements which contribute to the significance of heritage places.

To ensure that development does not adversely affect the significance of heritage places.

To conserve specified heritage places by allowing a use that would otherwise be prohibited if this will demonstrably assist with the conservation of the significance of the heritage place.

Before deciding on an application, in addition to the decision guidelines in Clause 65, the responsible authority will need to consider, as appropriate:

- *The Municipal Planning Strategy and the Planning Policy Framework.*
- *The significance of the heritage place and whether the proposal will adversely affect the natural or cultural significance of the place*
- *Any applicable statement of significance (whether or not specified in the schedule to this overlay), heritage study and any applicable conservation policy.*
- *Any applicable heritage design guideline specified in the schedule to this overlay.*
- *Whether the location, bulk, form or appearance of the proposed building will adversely affect the significance of the heritage place.*
- *Whether the location, bulk, form and appearance of the proposed building is in keeping with the character and appearance of adjacent buildings and the heritage place.*
- *Whether the demolition, removal or external alteration will adversely affect the significance of the heritage place.*
- *Whether the proposed works will adversely affect the significance, character or appearance of the heritage place.*
- *Whether the proposed subdivision will adversely affect the significance of the heritage place.*
- *Whether the proposed subdivision may result in development which will adversely affect the significance, character or appearance of the heritage place.*

Cardinia Shire Council does not have in depth heritage policy, however Clause 15.03-1S of the Cardinia Planning Scheme provides some strategies with respect for heritage conservation, which is reproduced below:

Objective

To ensure the conservation of places of heritage significance.

Strategies

Identify, assess and document places of natural and cultural heritage significance as a basis for their inclusion in the planning scheme.

Provide for the protection of natural heritage sites and man-made resources.

Provide for the conservation and enhancement of those places that are of aesthetic, archaeological, architectural, cultural, scientific or social significance.

Encourage appropriate development that respects places with identified heritage values.

Retain those elements that contribute to the importance of the heritage place.

Encourage the conservation and restoration of contributory elements of a heritage place.

Ensure an appropriate setting and context for heritage places is maintained or enhanced.

Support adaptive reuse of heritage buildings where their use has become redundant.

Consider whether it is appropriate to require the restoration or reconstruction of a heritage building in a Heritage Overlay that has been unlawfully or unintentionally demolished in order to retain or interpret the cultural heritage significance of the building, streetscape or area.

At present the Heritage Overlay curtilage reflects the property's boundaries. The Officer South Precinct Structure Plan proposes to reduce the Heritage Overlay curtilage to a significantly smaller area, encompassing the existing dwelling, outbuildings and some surrounding trees. All surrounding developable land will be rezoned as industrial and subdivided. We have been asked to assess the proposed smaller Heritage Overlay curtilage and to provide some comment on appropriate future uses for the heritage place.

In short, we can support the proposal to reduce the Heritage Overlay curtilage to the boundaries as shown in the plan provided by Veris, dated 13.04.23. The curtilage allows the heritage place to be retained, along with various mature trees, accepting there are no tree controls and new landscaping could be proposed. There are however some questions remaining with regards to 'significant' trees on the property. A report by Benchmark Heritage Management in 2020 comments that significant trees which were detailed on a map provided in the report should be protected under the Heritage Overlay – however it is unclear how the trees nominated by Benchmark as being significant came to have that status. While we would recommend that the proposed reduced curtilage be adopted as a basis for future planning applications, there may be scope to reduce the curtilage further depending upon the significance of the trees. It may be worth engaging a heritage landscape architect such as John Patrick Landscape Architects to assess the historic nature of the landscape, if questions regarding why certain trees have been identified as significant cannot be established.

In terms of future land use, while the existing dwelling could be converted into a café or community facility, its location, being within a proposed industrialised area, may impact its reasonable future use. Taking into consideration future development and heritage considerations, the main house, including the rendered and weatherboard envelopes, along with roof form and verandahs, would need be retained, and restored. There would however likely be opportunity to demolish the lean to on the north west side of the house, along with the outbuildings and sheds. Polite additions could then be constructed to the sides of the house, if required. Given there are no tree controls applicable to the Heritage Overlay, we would rely upon advice from an arborist or similar regarding the extent to which mature trees could be removed. The place appears to have historically been located within a garden setting, so an appropriate landscaping scheme to encompass the house would be prudent.

As discussed during our recent Teams meeting, another alternative use could involve connecting the house to the Cardinia Creek corridor and consider incorporating the place into a recreation area associated with the creek, rather than being a privately owned café servicing the future industrial area.

We trust the above is clear and look forward to further discussions on the matter.

Bryce Raworth Pty Ltd

11 July 2023

This advice is provided on a preliminary basis only, having regard for a site inspection and review of the current design documentation. The author has not had the benefit of an exhaustive briefing or of extensive research into the site or any related matter. This memorandum is provided for use by the client group only, and is not suitable for consideration by Council or any third party entity or individual.

Lecky Officer Pty Ltd
c/-Parklea
Level 1, 47 Timbertop Boulevard
Officer VIC 3809

C/o Paul Beatty
Director
URPS
PO BOX 844
Melbourne VIC 3001

Date: 04 August 2023
Our reference: 17224

Dear Paul,

Re: Preliminary Advice Regarding Cultural Heritage Obligations (PARCHO) for the Parklea Landholdings, Officer South Employment Precinct Structure Plan (PSP), Officer South, Victoria

Ecology and Heritage Partners was commissioned by URPS to provide Preliminary Advice Regarding Cultural Heritage Obligations (PARCHO) for the Parklea Landholdings, Officer South Employment Precinct Structure Plan (PSP), Officer South, Victoria (hereafter referred to as the study area).

1 Background

UPRS on behalf of Lecky Officer Pty Ltd proposes to develop landholdings within the Officer South Employment PSP in Officer South, Victoria. In the draft PSP prepared by the Victorian Planning Authority (VPA) for the Officer South Precinct, a 'cultural value investigation area' with a width of 200 m is shown along Cardinia Creek, located on the western boundary of the PSP.

The purpose of this PARCHO is to assess whether the 200 m required by the VPA is reasonable or whether the 100 m setback recommended by Tardis 2021 is sufficient.

In 2021 Tardis prepared an Aboriginal Cultural Heritage Impact Assessment (ACHIA) for the Officer South Employment PSP (Earl 2021), which recommended the provision of a 100 m wide development area setback along Cardinia Creek for the protection of Aboriginal cultural heritage. However, in the draft plan of the PSP prepared by the VPA a 200 metre setback is recommended. URPS, on behalf of Lecky Officer Pty Ltd requires advice as to whether the 100 m corridor recommended in the ACHIA is sufficient or whether the reserve of 200 m recommended by the VPA must be considered.

2 Methodology

This letter has been prepared with reference to the Aboriginal Cultural Heritage Impact Assessment (ACHIA) (Earl 2021), prepared by Tardis, the draft plan of the Officer South Employment PSP prepared by the VPA in 2023 and the Parklea Landholding Plan, prepared by Veris.

The following tasks were undertaken as part of this assessment:

- A desktop assessment, with all relevant cultural heritage databases and mapping programs examined including:
 - the Victorian Aboriginal Heritage Register (VAHR), administrated by First Peoples – State Relation (FP-SR);
- Identification of potential legislative implications (associated with cultural heritage values) for future development of the study area;
- Comment in regard to the setback corridors referred to by Tardis and the VPA; and
- Presentation of the results in this letter report.

3 Limitations

The cultural heritage information used to inform this assessment is limited to that obtained through the desktop assessment.

This report is an opportunity to provide a broad understanding of the study area and to identify relevant legislative implications in relation to the proposed development and provide comment on the setback corridors (Section 6).

4 Study Area

The study area comprises approximately 1,069 hectares and is bounded by the Princes Highway to the north, Cardinia Creek to the west, Patterson Road to the south and private property and Lower Gum Scrub Creek to the east. The Parklea landholdings form a portion of the study area, stretching from Cardinia Creek in the west as far as the PSP boundary in the east. The extent of the Parklea landholdings is shown in Appendix 2.

5 Victorian Aboriginal Heritage Register Search

A search of the VAHR was carried out on 27 April 2023 using access number 11920 for Aboriginal Places in the study area. A total of 11 registered Places are located within the study area. Nine of these Places are located within 200 m of Cardinia Creek and, of these, seven are located within 100 m of Cardinia Creek. Previously registered Places located within 200 m of Cardinia Creek are:

- **VAHR 7921-0230 (Cardinia Creek 18)** - Recorded as an artefact scatter and is comprised of unspecified number of quartz and flint/chert artefacts. Artefact types include flakes and a scraper. This Place was recorded as part of the Berwick-Pakenham Archaeological Survey (Smith 1989).
- **VAHR 7921-0229 (Cardinia Creek 17)** - Recorded as an artefact scatter and is comprised of unspecified number of quartz and silcrete flakes. This Place was recorded as part of the Berwick-Pakenham Archaeological Survey (Smith 1989).
- **VAHR 7921-0234 (Cardinia Creek 22)** - Recorded as an artefact scatter and is comprised of unspecified number of quartz, flint/chert and silcrete flakes. This Place was recorded as part of the Berwick-Pakenham Archaeological Survey (Smith 1989).
- **VAHR 7921-1843 (Officer South LDAD)** - Recorded as a surface Low Density Artefact Distribution (LDAD) and is comprised of three silcrete flakes. This Place was recorded as part of a heritage assessment in 2021 (Earl 2021).
- **VAHR 7921-0189 (Cardinia Creek 2)** - Recorded as an artefact scatter and is comprised of unspecified number of quartz and flint/chert flakes. This Place was recorded as part of the Berwick-Pakenham Archaeological Survey (Smith 1989).
- **VAHR 7921-0233 (Cardinia Creek 21)** - Recorded as an artefact scatter and is comprised of unspecified number of quartz and flint/chert flakes and microliths. This Place was recorded as part of the Berwick-Pakenham Archaeological Survey (Smith 1989).
- **VAHR 7921-0232 (Cardinia Creek 20)** - Recorded as an artefact scatter and is comprised of unspecified number of quartz and flint/chert flakes and microliths. This Place was recorded as part of the Berwick-Pakenham Archaeological Survey (Smith 1989).
- **VAHR 7921-0231 (Cardinia Creek 19)** - Recorded as an artefact scatter and is comprised of unspecified number of quartz, basalt and flint/chert flakes, worked cores and a chert bipolar core. This Place was recorded as part of the Berwick-Pakenham Archaeological Survey (Smith 1989).
- **VAHR 7921-0194 (Cardinia Creek 6)** - Recorded as an artefact scatter and is comprised of unspecified number of quartz and silcrete flakes. This Place was recorded as part of the Berwick-Pakenham Archaeological Survey (Smith 1989).

The following section reviews two archaeological reports which are relevant to this assessment.

5.1 Smith (1991)

Smith undertook an Aboriginal archaeological assessment of the Berwick-Pakenham Corridor for the Victorian Archaeological Survey (VAS). The assessment consisted of an Aboriginal cultural heritage study of the proposed

residential growth corridor which encompasses approximately 255 square kilometres of land which overlaps the current study area to the north. The report aimed to identify any areas of Aboriginal archaeological potential and significance and to assess whether the proposed corridor development poses any threats to Aboriginal archaeological potential. A survey was carried out as a part of the report which identified 62 unrecorded Aboriginal Places. They included 32 artefact scatters, 13 isolated artefacts, two scarred trees and two (n=2) object collections.

The report found that the highest densities of Aboriginal Places occur within areas containing waterways, stating in the Place location model that Aboriginal Places are expected to occur within areas associated in and around creeks and permanent water bodies. This includes the likelihood of shell middens, scarred trees and artefact scatters occurring along creek lines. Additionally, the report highlights that Place densities and numbers are expected to be high along Cardinia Creek as this area is believed to be used as a set path between the hinterland and the coast. The survey that was conducted as a part of this report reinforced these predictive models by finding a high density of Aboriginal Places within areas adjacent to existing creek lines, with 23 of the Aboriginal Places recorded being located along Cardinia Creek.

The report made recommendations which include that areas surrounding Cardinia, Toomuc and Ararat Creeks be re-zoned and retained as open space areas. Additionally, it was further recommended that archaeological surveys should be undertaken prior to the approval of development applications in all areas containing permanent water courses.

5.2 Aboriginal Cultural Heritage Impact Assessment (ACHIA) (Earl 2021)

An Aboriginal Cultural Heritage Impact Assessment (ACHIA) (Earl 2021) was prepared for the activity of the proposed Officer South Employment PSP. The Sponsor of the report was the VPA. The ACHIA was commissioned to investigate the known and potential Aboriginal cultural heritage in the proposed PSP and provide legislative recommendations for the management of Aboriginal cultural heritage. At the time of the ACHIA, the study area was located within multiple areas of cultural heritage sensitivity under *Aboriginal Heritage Regulations 2018* being:

- a registered Aboriginal Place and land within 50 m of a registered Aboriginal Place (.25(1) and r.25(2)); and
- land within 200 m of a waterway, namely Cardinia Creek, an Unnamed Lake and an Unnamed Swamp/Wetland.

At the time of the preparation of the ACHIA, there was no Registered Aboriginal Party (RAP) appointed for the activity area. Consequently, the Wurundjeri Woiwurrung Cultural Heritage Aboriginal Corporation (WWCHAC), the Bunurong Land Council Aboriginal Corporation (BLCAC) and the Boonwurrung Land and Sea Council (BLaSC) were consulted as representatives the Traditional Owners of the activity area and were all invited to participate in the assessment.

5.2.1 The Activity

The activity described in Section 2 of the ACHIA (Earl 2021: 9) sets out the description of the activity as follows:

The future activity comprises the subdivision of 1,069 hectares of land for industrial, commercial and residential development. These residential facilities may be supported by town centres, schools, community centres, parks and the relevant utilities that are needed to support such infrastructure. The full scope of the works to be carried out and plans have not been drafted. VPA is undertaking this report as preliminary research into the area before plans are drawn. As such, a detailed outline of the activity cannot be given within this report. Ancillary works are summarised below:

- The construction of residential dwellings and the relevant utilities to support these structures;
- Roads and paths for relevant access;
- Public Transport Network;
- Industrial facilities;
- Business centres;
- Crossings of Cardinia Creek.

Figure 1 (below) shows the draft development plan for the proposed PSP provided by the VPA.

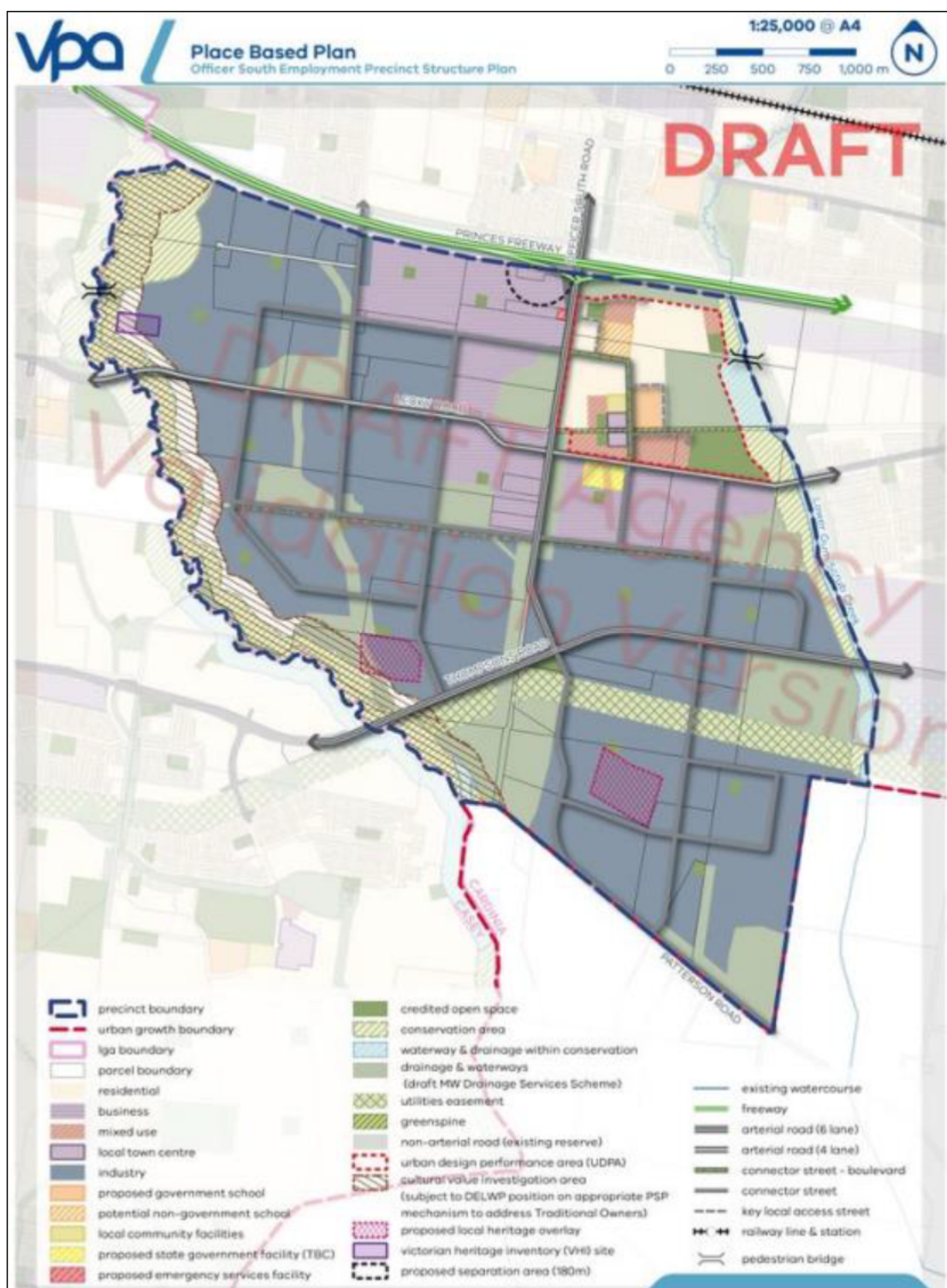


Figure 1: Draft plan for the Officer South Employment Precinct Structure Plan (source: Victorian Planning Authority 2023)

5.2.2 Assessments conducted for the ACHIA (Earl 2021)

A site inspection (survey) was conducted for the ACHIA with the participation of representatives from the Wurundjeri Woiwurrung Cultural Heritage Aboriginal Corporation (WWCHAC), the Bunurong Land Council Aboriginal Corporation (BLCAC) and the Boonwurrung Land and Sea Council (BLaSC). The site inspection took place on 15, 16 and 17 September 2020. However, land access was not available for a number of properties within the PSP study area and these parcels could not be inspected. Some of these parcels were included in areas of high archaeological potential, particularly within 200m of Cardinia Creek.

As a result of the site inspection a total of fifteen artefacts were identified; of these, twelve stone artefacts were added to an existing artefact scatter, VAHR 7921-0189 (Cardinia Creek 2) and three stone artefacts were recorded as a new Place, VAHR 7921-1843 (Officer South LDAD).

5.2.3 Cultural Values Assessment

A Cultural Values Assessment (CVA) was set to be undertaken with representative from the Wurundjeri Woiwurrung Cultural Heritage Aboriginal Corporation (WWCHAC), the Bunurong Land Council Aboriginal Corporation (BLCAC) and the Boonwurrung Land and Sea Council (BLaSC).

However, no date for the CVA had been set at the submission of the ACHIA in 2021.

The Traditional Owner groups did comment that they considered the entire activity area to be an area of high cultural heritage significance.

5.2.4 Recommendations from Earl 2021

Management recommendations were made in relation to the Aboriginal Places. These were as follows:

1) Recommendation 1: Mandatory Cultural Heritage Management Plans.

The requirement for mandatory Cultural Heritage Management Plans, particularly land within 200 m of Cardinia Creek, land within 200 m of the two unnamed water bodies, land including Registered Aboriginal Places and land within 50 m of registered Aboriginal Places and land immediately adjacent to Cardinia Creek.

2) Recommendation 2: Voluntary Cultural Heritage Management Plans

As the entire activity area is considered to be of high Aboriginal Cultural Heritage sensitivity, voluntary CHMPs should be undertaken at all locations where mandatory CHMPs are not required, if high impact activities, as listed in *Aboriginal Heritage Regulations 2018* are undertaken.

3) Recommendation 3: Consultation

Consultation with the RAP groups during the preparation of any future CHMPs.

4) Recommendation 4: Conservation Zone

A conservation zone extending 100m from the Cardinia Creek to protect any significant archaeological deposits immediately adjacent to the creek. This conservation area would also allow for the passive recreational use of the land, while protecting Aboriginal cultural heritage and allow for the revegetation of the area with Indigenous species. A section in the Cardinia Creek terrace, located in

the northwest of Property ID 2 should also be included in the conservation zone as this is also an area of high archaeological potential.

6 Legislative and Policy Implications

Implications for the project

The following assessment is made in relation to the requirement for the width of the conservation reserve along Cardinia Creek:

The report prepared by Tardis Earl (2021) recommended that a conservation corridor of 100 m be retained along the extent of Cardinia Creek. The draft plan prepared by the VPA allows for a conservation corridor of 200 m, in line with the mapped area of cultural heritage sensitivity designated in the *Aboriginal Heritage Regulations 2018*.

There are 11 registered Aboriginal Places known to be within the study area, six of which are located within 100 m of Cardinia Creek. Of the Places which are located at a distance greater than 100 m from Cardinia Creek, two are located on the alignment of the drain that follows Lecky Road and two others are located on watercourses within the study area. One of these Places, VAHR7922-1843 (an LDAD component) is located within an area of sensitivity associated with a natural waterway. The only Place which is not associated with a waterway is VAHR7822-1225, an artefact scatter.

The distribution of Places within the study area points to the close association between watercourses and Aboriginal Places. Six of the 11 Places within the study area (54%) are located within 100 m of Cardinia Creek, with a further three located within 200 m of the creek.

In this instance, a conservation corridor of 100 m from the creek is appropriate as this is the area most likely to have a larger number of intact Aboriginal Places in comparison to land extending another 100 m. In stating this it is noted that Aboriginal Places are still likely to be present in all land within 200 metres of a waterway and in any case, mandatory CHMPs will be required for any land on which a high impact activity such as subdivision (including commercial or industrial subdivisions) will be developed. The preparation of any CHMP along the course of Cardinia Creek will likely result in the identification of new Aboriginal Places which can then be managed in accordance with any management conditions stipulated in those CHMPs.

The conservation corridor of 100 m is therefore considered to ensure a better level of protection for the most intact number of Aboriginal heritage Places in the PSP.

Harm to Aboriginal Cultural Heritage

Under s. 27 of the *Aboriginal Heritage Act 2006* it is unlawful to harm Aboriginal cultural heritage or do an act that is likely to harm Aboriginal cultural heritage. Whilst the triggers for a CHMP discussed above provide the guidance as to whether a CHMP is required under the legislation, it is the proponent's responsibility to ensure that harm is not done to Aboriginal cultural heritage.

7 Conclusion

In conclusion, Recommendation 4 in the ACHIA prepared by Tardis (Earl 2021) states that the conservation zone should extend 100 m from Cardinia Creek to protect the significant archaeological deposits immediately adjacent to the creek. The 200 m setback outlined by the VPA in the draft plan is based on r.26 of the *Aboriginal Heritage Regulations 2018* which states that land within 200 metres of a waterway is an area of cultural heritage sensitivity.

Six Aboriginal Places are located within 100 m of Cardinia Creek with a further three Places are located within 200 m. This indicates that there is a greater concentration of Places closer to the creek; however, it should be noted that Aboriginal Places may occur anywhere in the landscape. In this instance a reserve with a width of 100 m is considered sufficient.

Under s.27 of the *Aboriginal Heritage Act 2006* it is an offence to cause harm to Aboriginal cultural heritage. Mandatory CHMPs must be prepared for any high impact activity as defined by the Aboriginal Heritage Regulations 2018.

I hope this information meets your requirements. Please do not hesitate to call either myself on [REDACTED] or Oona Nicolson, Director/Principal Heritage Advisor on [REDACTED] if you have any questions or require further information.

Yours Sincerely,



Dr Meredith Filihia
Associate Heritage Advisor/Technical Lead
Ecology and Heritage Partners Pty Ltd

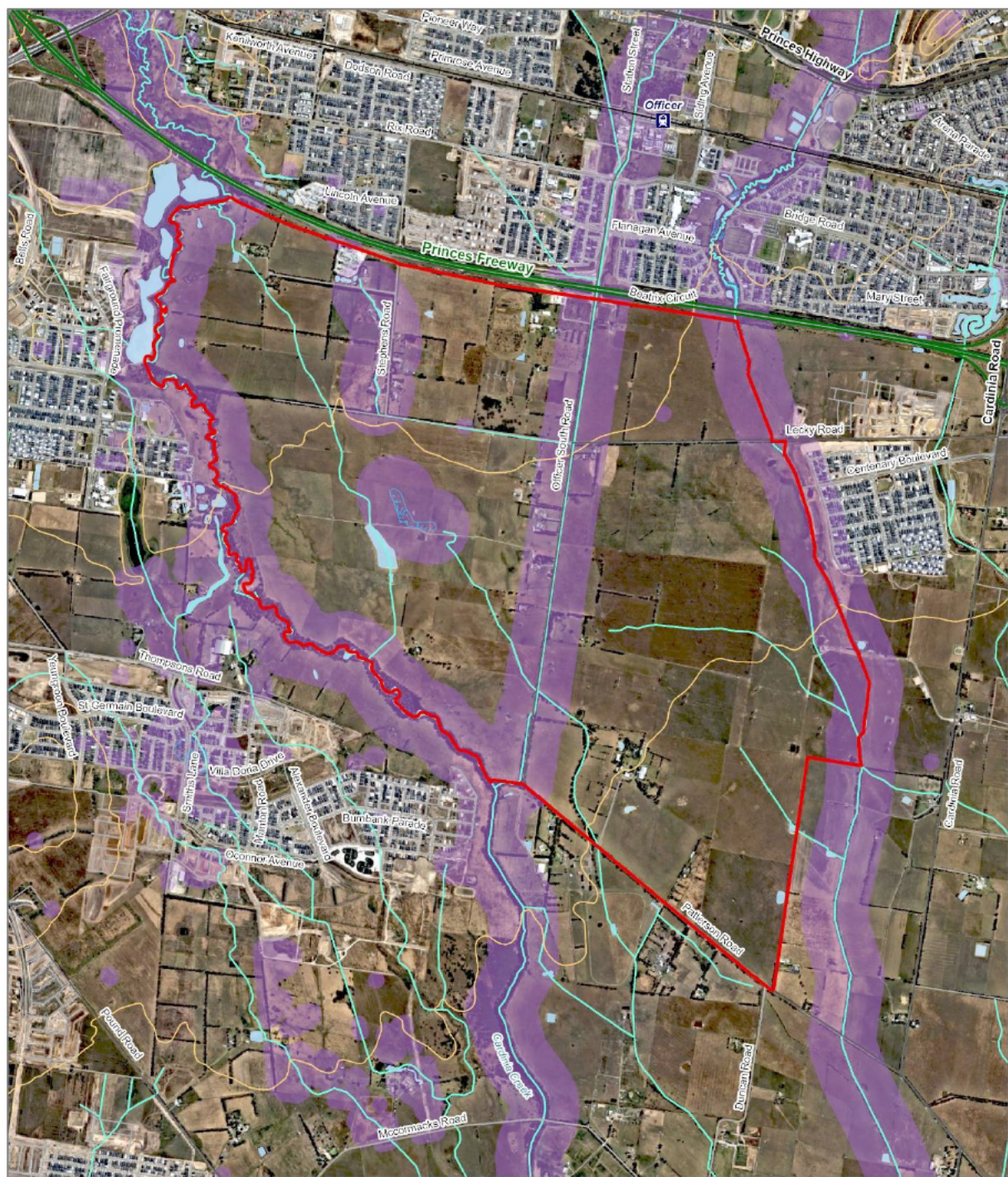
8 References

- Aboriginal Victoria, 2018 *Aboriginal Heritage Act 2006. Practice Note: Significance Ground Disturbance*. Aboriginal Victoria, Melbourne, Victoria.
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9 Appendices

9.1 Appendix 1

Maps



Map 1
Location and Extent of Study Area
Preliminary Advice Regarding Cultural Heritage Obligations for Officer South Employment Precinct Structure Plan, Officer South

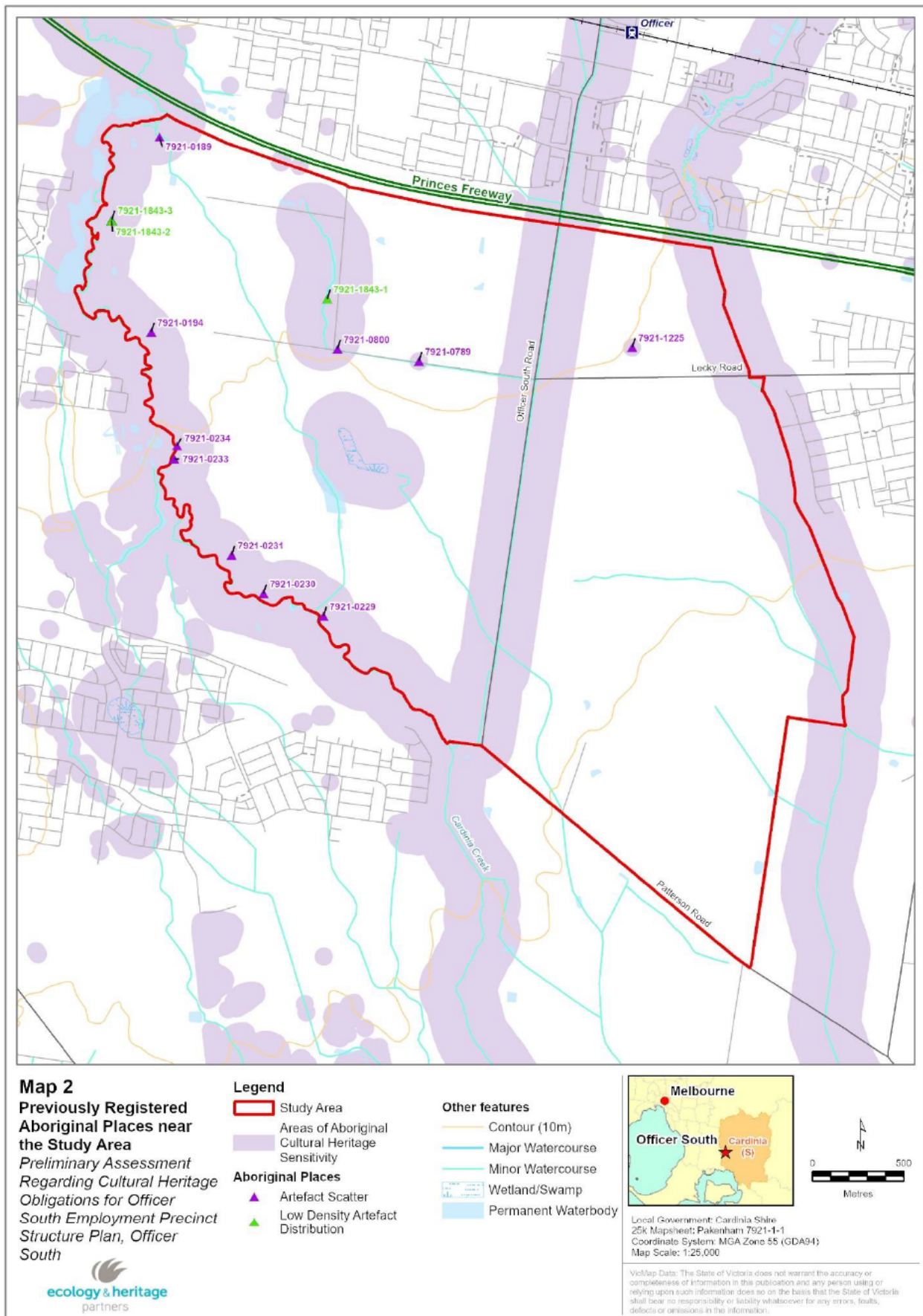
Legend

- Study Area
- Contour (10m)
- Railway
- Freeway
- Major Road
- Collector Road
- Minor Road
- Proposed Road
- Minor Watercourse
- Land Subject to Inundation
- Wetland/Swamp
- Permanent Waterbody
- Areas of Aboriginal Cultural Heritage Sensitivity



Local Government: Cardinia Shire
25k Mapsheet: Pakenham 7921-1-1
Coordinate System: MGA Zone 55 (GDA94)
Map Scale: 1:30,000

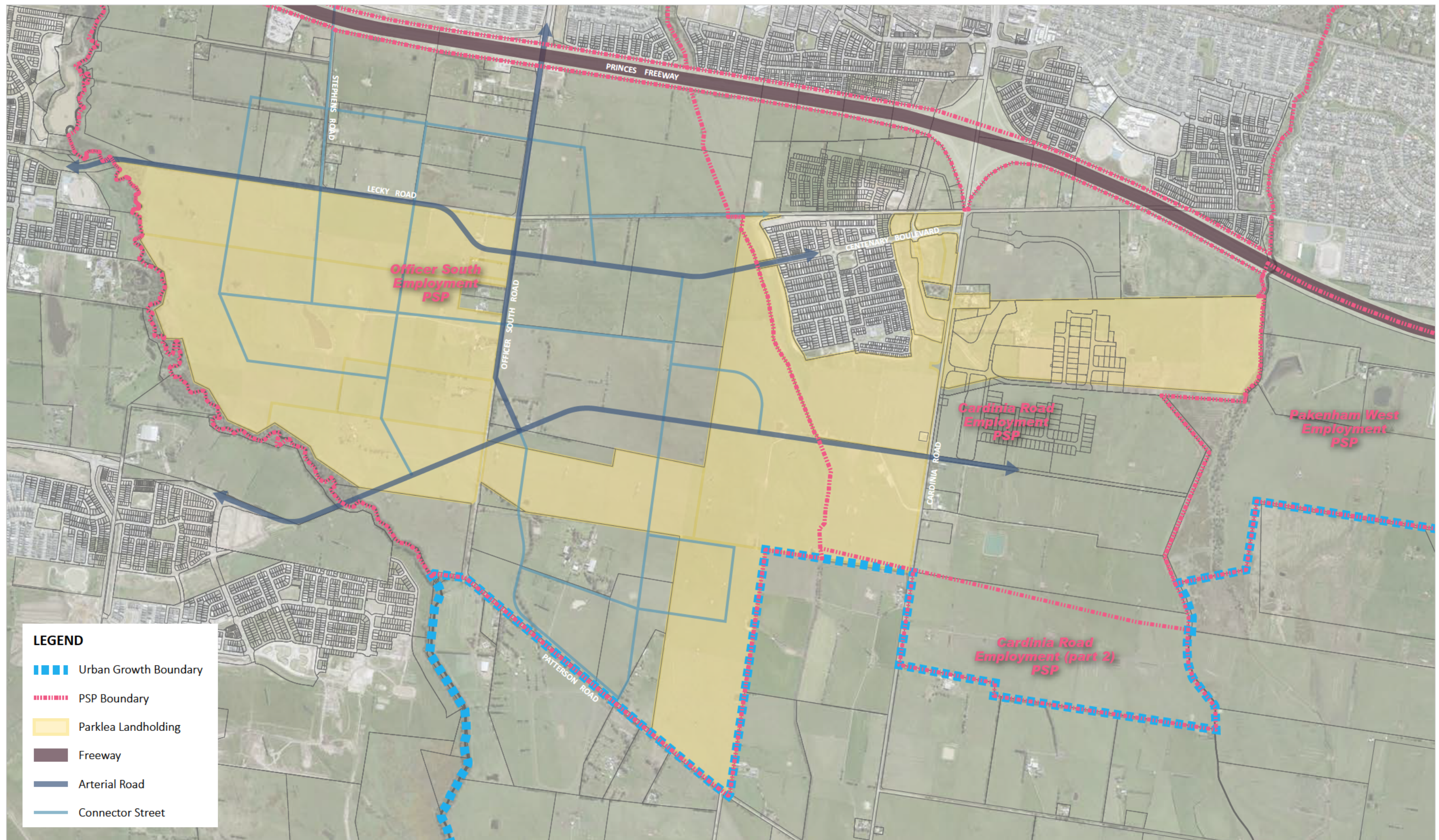
VicMap Data: The State of Victoria does not warrant the accuracy or completeness of information in this publication and any person using or relying upon such information does so on the basis that the State of Victoria shall bear no responsibility or liability whatsoever for any errors, faults, defects or omissions in the information.



17224_Map02_PrevAborPlaces 2/05/2023 (valadonnes)

9.2 Appendix 2

Parklea Landholdings Map



LEGEND

- ▬▬▬ Urban Growth Boundary
- - - - - PSP Boundary
- Parklea Landholding
- Freeway
- Arterial Road
- Connector Street

Parklea Landholding Plan

Officer South
304953 | 304953UDCB | Version B | 27.02.23



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Note: This is an indicative plan only based on the Planning Zones/Overlays and the PSP Guidelines (VPA). This plan and areas shown are subject to survey.

parklea.

veris

26 October 2023

Ethos Urban Reference: 3230245

Don Welsh
Director
Parklea Developments

Via email: [REDACTED]

Dear Don,

Subject: Officer South Employment PSP Activity Centre Advice

Parklea Developments (the client) is seeking economic advice regarding the implications of the recently released draft Officer South Employment Precinct Structure Plan (PSP) on the nearby planned Kaduna Park Neighbourhood Activity Centre (NAC). In particular, advice is sought as to the extent of supermarket and retail floorspace supportable at the planned centre in the north-east of the Officer South Employment PSP area.

Draft Officer South Employment PSP

The draft PSP for the Officer South Employment area was released by the Victorian Planning Authority (VPA) in September 2023 (Draft PSP).

New Precinct Structure Planning Guidelines were released by the VPA in October 2021 (PSP Guidelines), with the Draft PSP being prepared in line with these PSP Guidelines and the PSP 2.0 process. Under the new PSP Guidelines, PSP areas are to be developed having regard to 20-minute neighbourhood principles and include a greater range of density and diversity in housing, particularly higher density housing. Creating 20-minute neighbourhoods is a key principle of the Victorian Government's long term strategy Plan Melbourne 2017–2050.

The Draft PSP covers a net developable area of 628.3 hectares for employment and is to support 22,013 jobs at full development. In addition to the employment focus of the precinct, the area includes a residential component of 44.0 hectares of net developable area, which is slated to support 5,013 residents across 1,617 dwellings, based on an average household size of 3.1 persons. Dwelling density is forecast to average 37 dwellings per hectare across the residential area of the PSP.

The land use plan for the Draft PSP is shown in Figure 1.

Residential development is to be located within The Village sub-precinct, which is envisioned to be a compact residential precinct providing diverse housing options and key worker housing for the employment area. This area will include four different residential area types, as shown in Figure 2, as follows:

- Amenity-based Density area, with a target density of an average of 36 dwellings per hectare;
- Mixed Use area, with a target density of an average of 40 dwellings per hectare;
- Town Centre area, with a target density of an average of 40 dwellings per hectare; and
- Balance area, with a target density of an average of 32 dwellings per hectare.

The Village sub-precinct includes a Local Town Centre (LTC), with a stated purpose “to service all residents within the precinct and meet their day-to-day retail and community needs”. Notably, the PSP states that the amenities in The Village, including the LTC, “will support the adjoining community at Cardinia Road Employment precinct” (Officer South Employment PSP, p.19). In total, the LTC has a delivery guide for 2,300m² of retail floorspace and 1,600m² of commercial floorspace, and is to provide for a “small grocery store”.

The Draft PSP states that additional local convenience centres uses may be located in designated mixed-use areas adjoining local parks, provided they do not compromise the role and function of the LTC.

Land surrounding The Village is designated as business land under the Draft PSP, with this land to fall under the Commercial 2 Zone (C2Z). This business land surrounding The Village provides a buffer between residential uses and the balance of the precinct which is designated for industry uses and will fall under the Industrial 1 Zone (IN1Z).

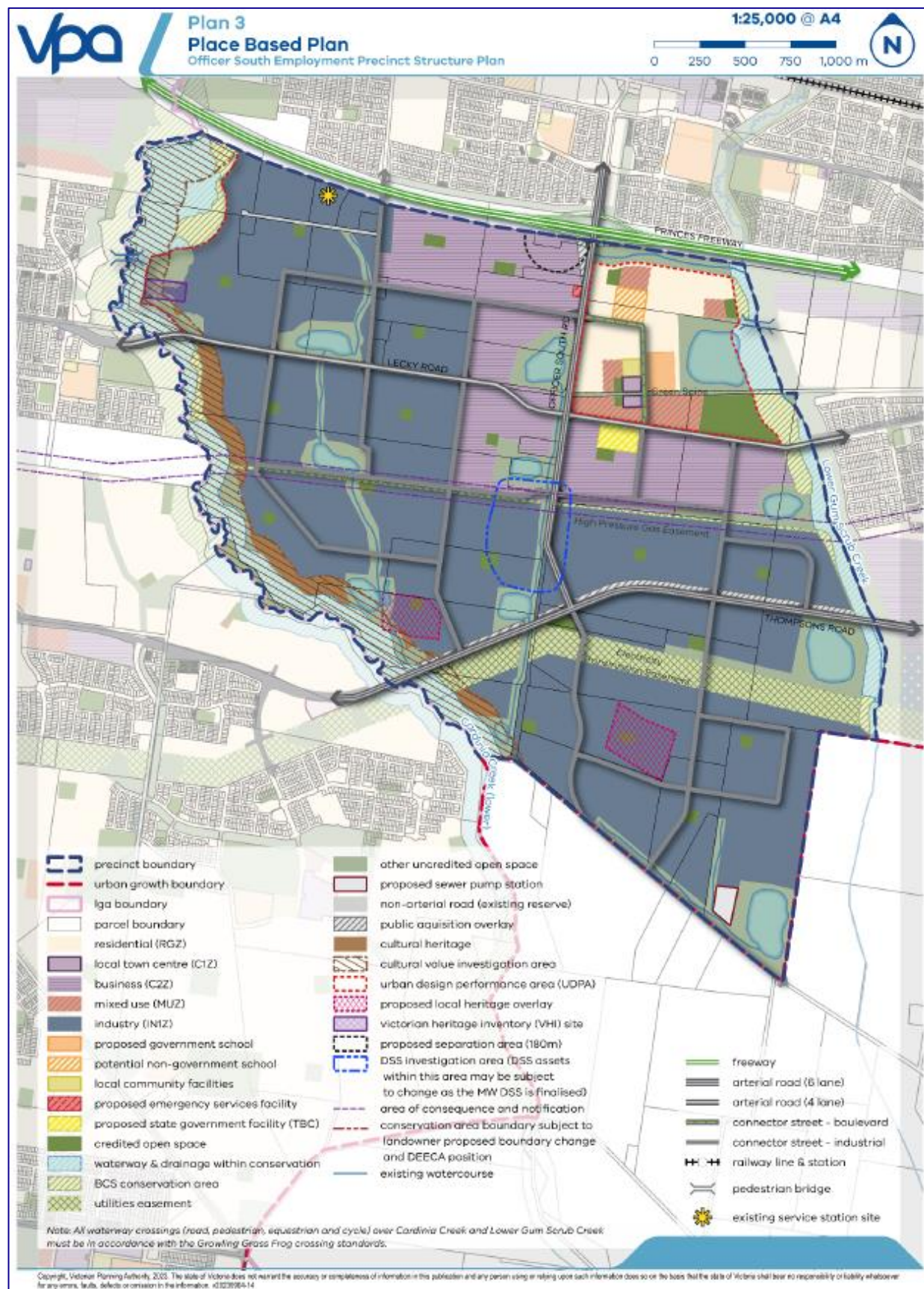
A draft *Schedule 7 to Clause 37.07 Urban Growth Zone* for the Officer South Employment PSP has been prepared for inclusion in the *Cardinia Planning Scheme*. Under *Specific Provisions – Use of Land* in *Section 2 – Permit Required*, it states that the leasable floor area of supermarkets within the Commercial 2 Zone must not exceed 500m².

Draft PSP Population Densities

The Draft PSP target densities of up to 40 dwellings per hectare appear high, even for a compact residential area surrounded by employment land. The updated PSP Guidelines state that PSPs should facilitate an average of 30 dwellings or more per Net Developable Hectare (NDHA) within 400m of an activity centre or train station, or within 50m of open space (Performance Target 1); and an average of 20 dwellings or more per NDHA across the entire PSP area (Performance Target 2).

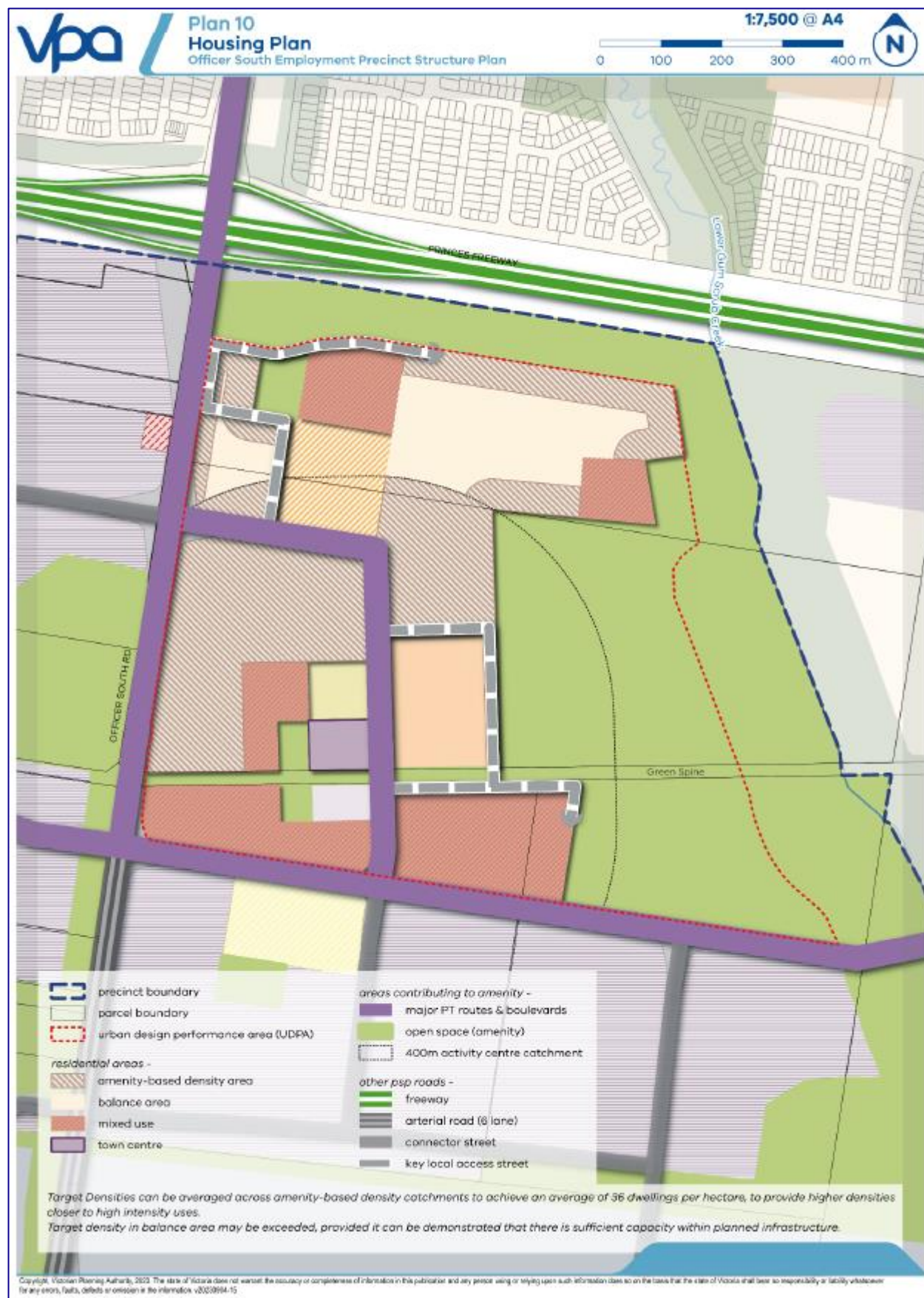
The target densities set out for The Village sub-precinct in the Draft PSP are significantly higher than the target densities outlined in the PSP Guidelines. It is also noted that higher density housing typically results in a lower number of persons per household. If the target densities for housing in The Village sub-precinct are not achieved and the capacity population of the area is less than envisaged, the amount the retail floorspace supportable in the area would also be reduced.

Figure 1 Draft Land Use Plan - Officer South Employment PSP



Source: VPA, Officer South Employment Precinct Structure Plan – Draft for Public Consultation, Sept 2023

Figure 2 Draft Housing Plan – Officer South Employment PSP



Source: VPA, Officer South Employment Precinct Structure Plan – Draft for Public Consultation, Sept 2023

Review of SGS Background Report

The *Officer South ePSP Economic Assessment* was undertaken in 2022 by SGS Economics and Planning at the direction of the VPA (SGS Report).

Local Centre Requirements Based on Population Catchment Benchmarks

The delivery guide of LTC floorspace in the Draft PSP is based on analysis provided in the SGS Report.

SGS Economics and Planning notes that it was not engaged to complete an assessment of residential requirements within the PSP area, and as such determined the supportable floorspace based on a series of population catchment levels. These catchment levels are outlined in Figure 3 below.

The Draft PSP population capacity of 5,013 residents led to the delivery guide for the proposed LTC of 2,300m² for retail floorspace and 1,600m² for commercial floorspace. It appears that this provision of retail and commercial floorspace has limited consideration of the local context and future land uses in the surrounding area as it is primarily based on population catchment level benchmarks. The guidance provided by SGS appears to be a generic application of retail benchmarks that does not take into consideration the local circumstances.

Figure 3 Local Centre Requirements by SGS Economics and Planning

Population size	Retail/ Hospitality (sqm)	Local commercial services (sqm)	Total centre floorspace (sqm)	Total centre land area (Ha)
5,000	2,300	1,600	3,900	1.5
10,000	4,400	3,200	7,600	3
15,000	6,700	4,800	11,500	4.5
20,000	9,000	6,400	15,400	6

Source: SGS Economics and Planning, 2022

Strategic Policy and Competitive Context Understated

Chapter 2 of the SGS Report considers the policy context of Officer South Employment PSP area. It reviews a range of strategic documents that inform both State and local planning policy. However, no reference is made to the approved Cardinia Road Employment (CRE) PSP, published September 2010, and the directions and land use vision for this precinct.

The CRE precinct is located immediately east of the Officer South Employment precinct. The CRE PSP designates a NAC (Kaduna Park NAC) in the northern portion of the precinct fronting Cardinia Road, and 150 metres to the south of the intersection of Cardinia and Lecky Roads. The CRE PSP states that the Kaduna Park NAC is to support:

- Approximately 6,000m² of retail floorspace, including a 'main street' centre comprising:
 - A full-size supermarket of a maximum 3,500m²
 - A range of specialty retail providing a wide range of personal and professional services, niche retail, and hospitality, such as cafés, restaurants and taverns or bars.
- A minimum of 4,000m² of office floorspace.

In total, the retail and commercial floorspace provision guide is approximately 10,000m². This designated centre is not referenced or discussed in the SGS Report.

The SGS Report notes that the proposed land use configuration for Officer South Employment precinct will allow for a small residential community that could integrate with the CRE precinct residential community to the east. However, the report also notes that the plan "*responds to the need for the residential area to support population thresholds to enable efficient provision of community infrastructure for both Officer South Employment and the adjoining Cardinia Road Employment Precinct (CREP) residents.*" (SGS Report, p.78)

This implies that the SGS Report envisions the Officer South Employment precinct to include retail facilities to also support the CRE precinct, without due regard for the approved Kaduna Park NAC which is designated to already serve this role.

This potential view is further implied by the statement that “*a potential centre in Officer South is likely to have an approximate catchment of 10,300 residents by full development*” (SGS Report, p.96). With the Officer South Employment Precinct only supporting a population of approximately 5,000 persons, it is assumed that the SGS Report includes the CRE precinct population within their catchment.

The lack of reference to the approved and incorporated CRE PSP in the SGS Report suggests that the Officer South Employment precinct has been considered in isolation, and not in the context of the existing approved retail hierarchy, which includes the Kaduna Park NAC. Planning for retail uses in the Officer South Employment PSP should have regard for the approved centre hierarchy in the surrounding region, in particular, the Kaduna Park NAC.

Kaduna Park NAC Retail Assessment

A report titled *Kaduna Park Neighbourhood Activity Centre Retail Assessment* (Retail Assessment) was undertaken by Ethos Urban for the Kaduna Park NAC in May 2019. This assessment identified a retail catchment, which included all residential designated land within the CRE precinct and was forecast to support 4,600 persons at capacity.

The Retail Assessment found that a full-line supermarket, as envisaged in the CRE PSP, could not be supported in the retail catchment due to the population of the retail catchment being unlikely to reach a level high enough to support the quantity of retail floorspace envisaged in the CRE PSP.

Additional work undertaken by Ethos Urban in November 2022 found that the population within the Officer South Employment precinct would assist in supporting the Kaduna Park NAC as legislated under the approved CRE PSP. This work noted that any future competing supermarket within the Officer South Employment PSP had the potential to dilute the opportunity for the future development of the Kaduna NAC as envisaged by the approved CRE PSP.

This additional work concluded that in order to support a full-line supermarket within the CRE PSP area, a smaller retail offer should be planned for in the Officer South Employment precinct, such as a Local Convenience Centre (LCC) without a supermarket. This would allow for the demand for supermarket floorspace to be consolidated across the two precincts, resulting in one larger supermarket offer to support the surrounding communities.

Implications for Kaduna Park NAC

The previous work undertaken by Ethos Urban finds that the future population within the residential areas of the Officer South Employment precinct will support the designated NAC in the CRE precinct, being the Kaduna Park NAC.

If a LTC of 2,300 m² is provided within the Officer South Employment precinct, as outlined under the Draft PSP, then it may have adverse implications on the Kaduna Park NAC and the CRE precinct more broadly. In particular, the retail offer supportable would likely be less than the amount legislated under the CRE PSP.

The result of this would be that potentially only convenience level retail would be located within the Officer South Employment and CRE precincts, with residents having to travel north across the Princes Freeway to access a full-line supermarket and undertake their weekly grocery shop.

It is considered appropriate for the retail floorspace demand generated by the two precincts – Officer South Employment and CRE – to be concentrated to support a larger centre at one location. One larger centre would be better suited to meet the weekly grocery and other needs of the entire population located south of the Princes Freeway, with this centre able to be of a scale to meet the modern consumer expectations of the local population such as including a full line supermarket.

Given that Kaduna Park NAC is already enshrined in the planning policy, being recognised under the CRE PSP and gazetted through amendment to the planning scheme, this is the obvious location for the centre. The centre would be well positioned to support the two residential areas and provide for the weekly shopping needs of both precincts.

Supermarket Floorspace Capacity Analysis

The amount of retail floorspace supported across the Officer South Employment and CRE precincts, referred to as the Catchment, will ultimately be informed by the amount of supermarket floorspace accommodated in the precincts. The preferred outcome for current and future residents would be for this supermarket floorspace to be concentrated in a single location, to ensure that the supermarket is of sufficient scale to be able to effectively serve the grocery needs of local residents.

The future population across the Catchment will be approximately 9,610 persons, based on the Draft PSP and the Retail Assessment for the CRE precinct. Based on this population, it is estimated that the opportunity would exist for approximately 3,910m² of supermarket floorspace in the Catchment, as shown in Table 1. This scale of supermarket floorspace could accommodate one full line supermarket and one small grocery store.

This analysis is based on the following high-level assumptions:

- 75% of Food, Liquor and Grocery (FLG) spending to be directed to supermarkets
- 60% of supermarket spending to be retained by supermarkets in the Catchment
- 6% of supermarket sales to be non-FLG sales
- 20% of supermarket sales to come from beyond the Catchment (including from employment land)
- An average supportable trading level of \$11,500 per m² for supermarkets.

A market share of 60% of the supermarket sales retained in the Catchment is considered appropriate and reflects the surrounding competitive situation, including the predominance of the future Officer Major Activity Centre north of the Princes Freeway.

The analysis shows that although small convenience level supermarkets could be supported in both Officer South Employment and CRE precincts, a larger full-line supermarket could only be supported at one precinct.

Table 1 *Supportable Supermarket Floorspace (Constant 2023 Dollars)*

Item	Catchment
Capacity Population	9,613
Total Catchment FLG Spending	\$75.3m
FLG Spending Directed to Supermarkets (75%)	\$56.5m
Supermarket Spending Retained in the Catchment (60%)	\$33.9m
Total Sales from Catchment (including 6% in non-FLG sales)	\$36.0m
Total Sales Including 20% from Beyond (for Employment Land)	\$45.0m
Supermarket Floorspace Supportable (Trading Level of \$11,500/m²)	3,910m²

Source: Ethos Urban

It is considered most appropriate that the above supportable supermarket floorspace provide for the 3,500m² full line supermarket designated under the planning policy for Kaduna Park NAC, together with a small supermarket or grocery store of less than 500m² in Officer South Employment precinct to meet the immediate convenience needs of this area.

Recommendations

Due to the lack of consideration for the approved CRE PSP and its associated NAC in the SGS Report, it is considered that the retail floorspace outlined for the Officer South Employment precinct under the Draft PSP does not reflect an appropriate outcome for the precinct.

Our high-level analysis finds that up to 500m² of supermarket floorspace can be provided in the Officer South Employment precinct without having undue impacts on the designated Kaduna Park NAC. This scale of floorspace would be able to accommodate a small supermarket or grocery store as outlined in the Officer South PSP. The store would be able to serve the top-up grocery shopping needs of surrounding residents and workers.

It would also anchor the proposed activity centre in the Officer South Employment precinct and be a key driver of visitation.

Based on our experience, together with a review of the local context, a supermarket/grocery store of up to 500m² would be able to support up to a further 1,000m² of retail floorspace. A local centre with approximately 1,500m² of retail floorspace would be able to adequately serve the daily convenience shopping needs of local residents and the local workforce. A centre of this scale would be supportable by local demand and would be more appropriate given the competitive context of the area.

This outcome would ensure that the recognised Kaduna Park NAC can be developed with a full-line supermarket and supporting retail as designated under the existing planning policy. Any retail in the Officer South Employment precinct must be subordinate to the Kaduna Park NAC, in terms of its role and function, otherwise it may impact on the viability or timing of the designated Kaduna Park NAC.

A smaller scale of retail floorspace at the LTC in the Officer South Employment precinct would also reduce the risk of an unfavourable retail outcome for the region as a whole, particularly in terms of potentially delaying the development of the Kaduna Park NAC. Reducing the size of the LTC would result in a positive outcome for the current and future residents and workers across the two precincts by allowing for the designated Kaduna Park NAC to be developed in a timely manner, while also ensuring the convenience retail needs of the Officer South Employment precinct community can be met in the local area.

In summary, based on the analysis provided in this response, it is recommended that the provision of retail floorspace at the LTC be reduced to a maximum 1,500m² (inclusive of a supermarket/grocery store of maximum 500m²) to ensure that the Kaduna Park NAC is able to be developed as recognised under the gazetted CRE PSP.

To this end, the *Schedule 7 to Clause 37.07 Urban Growth Zone* for the Officer South Employment PSP (*Section 1 – Permit Not Required*) is recommended to be updated to state that the combined leasable floor area on land identified as 'local town centre' must not exceed 1,500m², and that the leasable floor area of supermarket on land identified as 'local town centre' must not exceed 500m².

Furthermore, to avoid any possible confusion, the reference to a supermarket in the definition for a 'local town centre' in the 'glossary of terms' on page 103 (Appendix 9) should be deleted.

Yours sincerely,



Emma Keller
Principal - Economics

