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Ref. 25097S01

24 March, 2025

**C295CASE - CASEY FIELDS SOUTH (EMPLOYMENT) & DEVON MEADOWS PRECINCT  
STRUCTURE PLAN, March 2025 - Submission to VPA**

**RE: 1870 South Gippsland Hwy & 14 Rawlings Road Deveon Meadows**

*Terrain Consulting Group* has been engaged by the prospective purchasers of land at 1870 South Gippsland Hwy & 14 Rawlings Road, Devon Meadows to review the Casey Fields South (Employment) & Devon Meadows Precinct Structure Plan, March 2025 and Proposed Amendment C295case.

**Land details:**

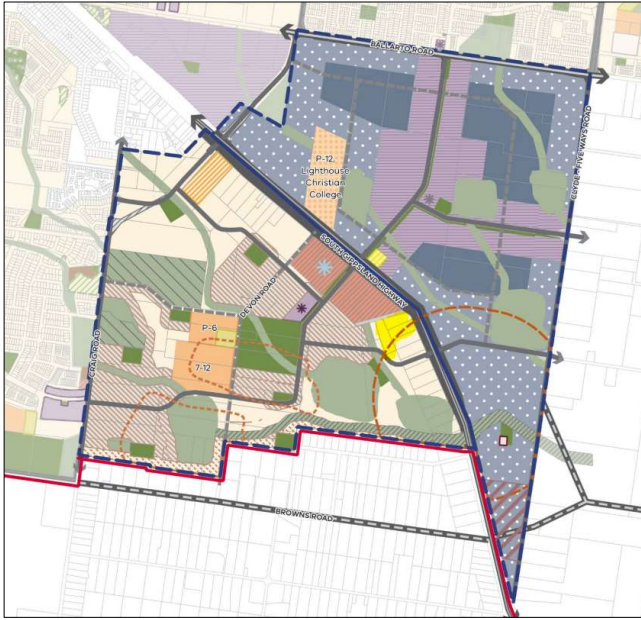
Our client's property is identified as:

- DM52 (14 Rawlings Road, Land in Plan of Consolidation 108819, Title Vol 09337, Fol 596), a 1.06ha site with a NDHa of 1.06ha;
- DM53 (corner lot, Lot 36 on Plan of sub 034215, title Vol 08806, Fol 437), a 0.83ha site with a NDHa of 0.83ha; and
- DM54 (southern lot, Lot 35 on Plan of Sub 034215, title Vol 08806, Fol 437 ), a 0.91ha site with a NDHa of 0.91h

The land is currently located within a Farming Zone and is designated as **Residential** on *Plan 2 – Place Based Plan* (Plan 1 – Urban Structure in proposed UGZ15), with the applied zone being Clause 32.08 – General Residential Zone (refer image on following page).

The land is also included within 'Balance Area' (traditional suburban residential with average of 20 dwellings or more per Net Developable Hectare Area (NDHa) on *Plan 3 – Housing*.

This equates to an expected development yield of approximately 56 dwellings over the total land holding of 2.8ha.



### Alternative land uses

Our clients would ideally like to build a medical centre facing South Gippsland Hwy and a childcare centre facing Rawlings Road, with dwellings on the balance of the land.

Within the General Residential Zone (applied zone):

- A medical centre up to 250 sq.m is a Section 1 use provided specific requirements are met (a S1 use). It otherwise is possible with a planning permit (a S2 use)
- A child care centre is an unspecified S 2 use, possible with a planning permit.

However, there are specific use provisions proposed for Schedule 15 to the Urban Growth Zone (UGZ15) that override those of the General Residential Zone, including:

- Medical Centre - Section 1 (permitted) use provided: *The location of the use must be generally in accordance with the location of 'local community facilities' in the Casey Field South (Employment) and Devon Meadows Precinct Structure Plan and with the prior written consent of Casey City Council.*
- Child Care Centre – Section 2 (permit required) use provided: *The location of the use must be generally in accordance with the location of 'local community facilities' in the Casey Field South (Employment) and Devon Meadows Precinct Structure Plan and obtain the prior written consent from Casey City Council.*

Given the above, whilst a permit can be issued for a medical centre outside the area designated for 'local community facilities' this is not possible for a childcare centre.

We note that a small area west of Devon Road is set aside for 'Local Community facilities' - away from a main road, adjoining 2 government school sites and an open space reserve.

It is our submission that:

- Both these particular provisions should be removed altogether from the GRZ15 table of uses or:
- The restriction on child care centre be removed from the UGZ15 table of uses to allow a permit to be issued for this use outside the 'local community facilities' area.

The basis for this is:

- These land uses are compatible with the proposed residential area and purposes of the General Residential Zone.
- They should be located where they are conveniently accessible and visible to passing traffic.
- An abuttal to South Gippsland Hwy is appropriate for non- residential land uses ( as per provisions for a medical centre in the GRZ) ensuring direct main road access and minimal disruption to residential streets and core residential areas.
- The uses proposed would compliment the proposed mixed use zone that commences north of Rawlings Road and provide a soft introduction to the mixed use and commercial areas further north.
- The area set aside for local community facilities is in adequate in size to accommodate a medical centre and child care centre

#### Glass Factory separation distance.

The southern part of the site is included within 500m *glass factory separation distance* also shown on *Plan 2 – Place Base Plan*

We note that the *Devon Meadows and Casey Fields South (Employment) PSP Odour, Dust, and Noise Assessment* by GHD, December 2024, includes the following summary and recommendation in relation to the Clear View Commercial Glass site at 1925 South Gippsland Hwy Clyde which may affect development within the Precinct.

*The 500 m separation distance for dust from Clear View Commercial Glass should be adopted to prevent any potential dust impacts. This separation distance does not extend to the proposed locations of the schools or community facilities however it should be noted that future proposed sensitive receptors would not be recommended to be proposed within the separation distance. If sensitive uses are proposed within the 500 m separation distance, targeted mitigation measures would need to be applied to break the source-pathway-*

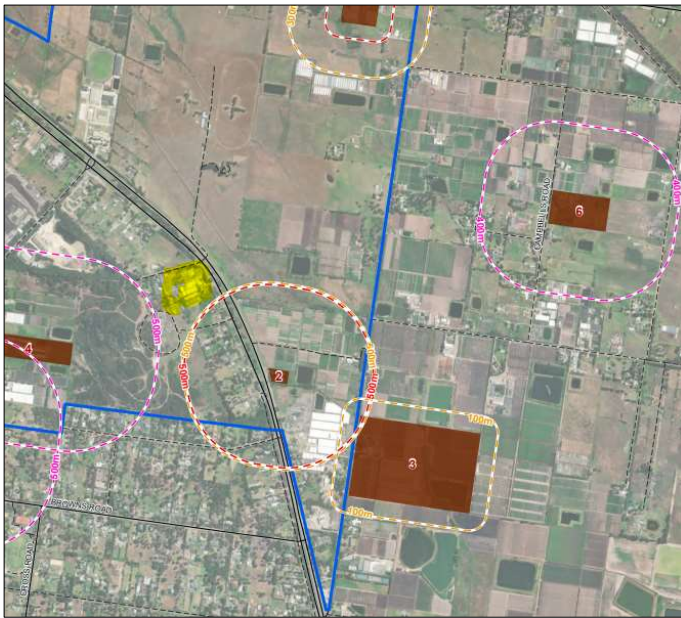
*receiving environment chain such as planting and or bunding to decrease the pathway effectiveness.*

*It is recommended for VPA to designate this 500 m separation distance as “area for investigation” with further stakeholder investigations to be undertaken to determine the nature of operations undertaken on site. In the event it is confirmed that glass manufacturing does not occur onsite, then the separation distance would not apply, and the risk assessment would result in a low risk of dust impacts.*

Whilst the 500m separation distance relates to possible dust impacts from the Clear View Glass factory, it remains unclear what implication (if any) this will have on the development potential of our client’s land.

We also note there is a discrepancy in the extent of the 500m buffer distance as shown in Appendix A , Figure 4 – *Separation Distance Analysis* in the *Casey Fields South & Devon Meadows PSP Land Capability Assessment* by SMEC, 30 July 2024.

This figure suggests the 500m buffer falls short of our client’s property (see below).



We therefore also question the accuracy of the 500m glass factory separation distance as shown in Plan 2 - Place Based Plan of the draft PSP (Plan 1 in the proposed UGZ15).

It is our submission that the implications of the 500m glass factory separation distance are ambiguous and unclear and that further details are required in order to respond accordingly.

**Terrain Consulting Group**

**March 2025**