

Submission to

# Casey Fields South Employment & Devon Meadows PSP & Amendment C295case

95 Devon Road, Devon Meadows

**Client**  
Halit Flowers

**Issued**  
31 March 2025





Executive Summary

Halit Flowers, the landowner at 95 Devon Road, Devon Meadows, is generally supportive of the residential designation across a portion of the subject land, as proposed in the draft Casey Fields South And Devon Meadows Precinct Structure Plan (CFS&DM PSP).

The draft CFS&DM PSP also identifies a government secondary school on a significant portion of the subject land. A review of the Community Infrastructure and Open Space Needs Assessment (CIOSNA) indicates that the future Devon Meadows population will not generate the population demand to support such a costly asset. Instead, its inclusion appears to be aimed at ensuring all residential homes are located within 3,200 meters of a secondary school, in line with the VPA PSP 2.0 Target 18.

Analysis of The 3.2km secondary school catchment area encompasses a substantial portion of the future Clyde South residential precinct. From a broader strategic land use perspective, relocating the proposed secondary school to the future Clyde South precinct is considered a more efficient use of land. This move would make available additional land for residential purposes within Devon Meadows, which is a significantly constrained precinct, and would benefit both precincts.

This submission provides further analysis regarding the relocation of the proposed secondary school, as well as other matters, which are summarized as follows:

- Devon Meadows will have low demand for a government secondary school. The CIOSNA calculates that by 2051, only 34% of a government secondary school will be required.
- The need for a secondary school originates from catchment distance rather than population demand. The VPA seeks to ensure that all residential homes are within 3,200m of a secondary school (Target 18).
- The Devon Meadows Precinct adjoins the Urban Growth Boundary. This land is zoned Green Wedge and is unlikely to generate the critical population mass in the future to significantly increase the 34% demand for a secondary school.
- Similar to Devon Meadows, the future Clyde South precinct is expected to have low demand for a new secondary school, as approximately three-quarters of the precinct is already within a 3.2 km catchment of the existing Clyde Secondary College.
- There is an opportunity to better locate the secondary school to serve both the Devon Meadows and Clyde South precincts which will eliminate the need for an additional school to explicitly service the Clyde South PSP. This approach to the location of secondary education services will make better use of the finite urban land within Melbourne's southeast urban growth corridor.
- Shifting the school location to serve both residential precincts will align more effectively with PSP 2.0 Feature 14.3, as the outcome is more cost-effective, responds to the observed low demand, and frees up additional land for residential purposes.
- In addition, a single, well-attended school is preferred over two poorly attended schools, as it can likely offer a broader range of resources and facilities to students.
- Further supporting the proposed school relocation is the South Gippsland Eggs separation buffer which covers a significant portion of the subject site and specifically, the land earmarked for the proposed secondary school. The odour assessment prepared by GHD recommends that the government secondary school should not be developed until after the egg farm has ceased operations, which presents an indefinite timeline.
- The non-disclosure of the 12 identified places of Aboriginal Cultural Heritage presents a potential liability to landowners within the CFS&DM Precinct. Specifically, the potential requirement within future Cultural Heritage Management Plans (CHMP) for the protection of places and artifacts within heritage and conservation parks or open space reserves could create significant uncertainty regarding the development potential of the site. If these outcomes are to be implemented through future CHMPs, the PSP must specify the ownership and management requirements for this land.
- It is submitted that refinement of the staging plan is required to facilitate the development of more land parcels across the PSP in a timely manner.

Introduction

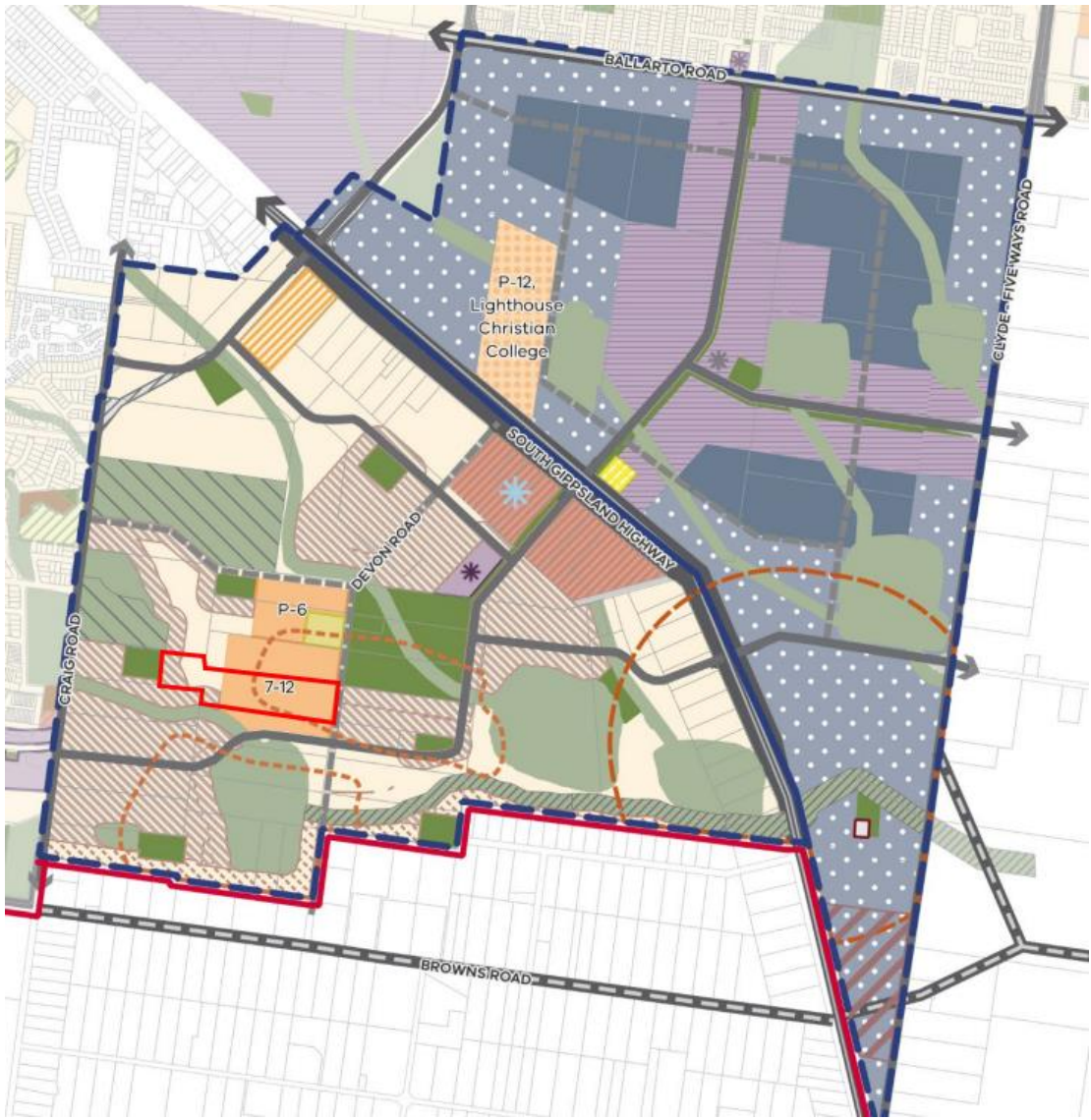
Beveridge Williams provides the following submission to the Casey Fields South (Employment) and Devon Meadows Precinct Structure Plan (CFSDM PSP) and associated Amendment C295case on behalf of Halit Flowers, the landowner of 95 Devon Road, Devon Meadows. The site is centrally located within the Devon Meadows precinct and encompasses an area of 5.175 Ha. The site is currently used as a market garden.

The draft CFS&DM PSP identifies a government secondary school across approximately tow-thirds of the site (3.44Ha). A mix of *Increased Amenity* (high residential density) and *Balance Area* (standard residential density) is proposed over the remaining third of the site which is located at the rear of the property.

The planning scheme amendment known as C295case seeks to implement the draft PSP and associated planning controls to the site at 95 Devon Road to facilitate future use and development in accordance with the PSP Plan 2: Place Based Plan. The proposed controls include applying the:

- Inserts UGZ15 and rezones the precinct from Farming Zone 3 (FZ3), Urban Floodway Zone (UFZ) and UGZ to UGZ15.
- Amends the Schedule to Clause 52.17 Native Vegetation to include native vegetation removal exemptions for the Casey Fields South (Employment) and Devon Meadows PSP.
- Amends the Schedule to Clause 72.03 to include the revised list of maps in the Casey Planning Scheme.
- Amends the Schedule to Clause 72.04 Schedule to the Documents Incorporated in this Planning Scheme to incorporate one new document: Casey Fields South (Employment) and Devon Meadows Precinct Structure Plan, February 2025

Figure 1: Extract from PSP Plan 2: Place Based Plan (VPA 2024)



95 Devon Road, Devon Meadows



Subject Site and Surrounds

The subject site at 95 Devon Road, Devon Meadows is rectangular in shape and has a frontage to Devon Road of 103.80m and a depth of around 381.41m. The land has a total area of 5.175ha. The property is currently used as a flower wholesale business with sheds and infrastructure to support this use. A large dam is located on the southern boundary and is used for onsite irrigation purposes. The rear of the property remains largely undeveloped. Access to the site occurs from Devon Road which adjoins the eastern boundary of the property.

The subject site is surrounded by other rural properties that are also form part of the Devon Meadows Precinct. These properties are generally used for a range of agricultural uses but are anticipated to transition to reflect the VPA's Vision for the Devon Meadows Precinct.

The Devon Meadows precinct is separated from the Casey Fields South precinct by the South Gippsland Highway, which effectively divides the PSP into two parts. The Casey Fields South precinct is primarily used for productive farming, although a variety of commercial and industrial uses have already been established along Ballarto Road. Lighthouse Christian College, an existing privately owned secondary school, is also located in Casey Fields South, immediately adjoining the South Gippsland Highway and adjacent to Devon Road.

The Casey Fields South precinct wraps around Devon Meadows to the east, with Clyde-Five Ways Road forming the eastern boundary of the CFS&DM PSP. East of Clyde-Five Ways Road lies the future Clyde South residential precinct, which covers approximately 1,099 hectares and represents the last residential precinct within the City of Casey. The Clyde South PSP is currently identified as a Horizon 2 Project, with the commencement of PSP preparation potentially beginning as early as July 2025, depending on the outcomes of the VPA's 2025/26 Business Plan.

The CFS&DM PSP adjoins Melbourne's Urban Growth Boundary (UGB). Immediately south of the Devon Meadows precinct is an established rural residential community. These properties are located within the Green Wedge Zone and are generally larger in size than conventional residential lots.

Botanic Ridge adjoins the western boundary of the Devon Meadows precinct. The Botanic Ridge precinct supports a range of residential densities, with standard densities dominating the urban fabric, averaging around 450m² per lot.

Figure 2: Site Context Aerial (NearMap 2024)



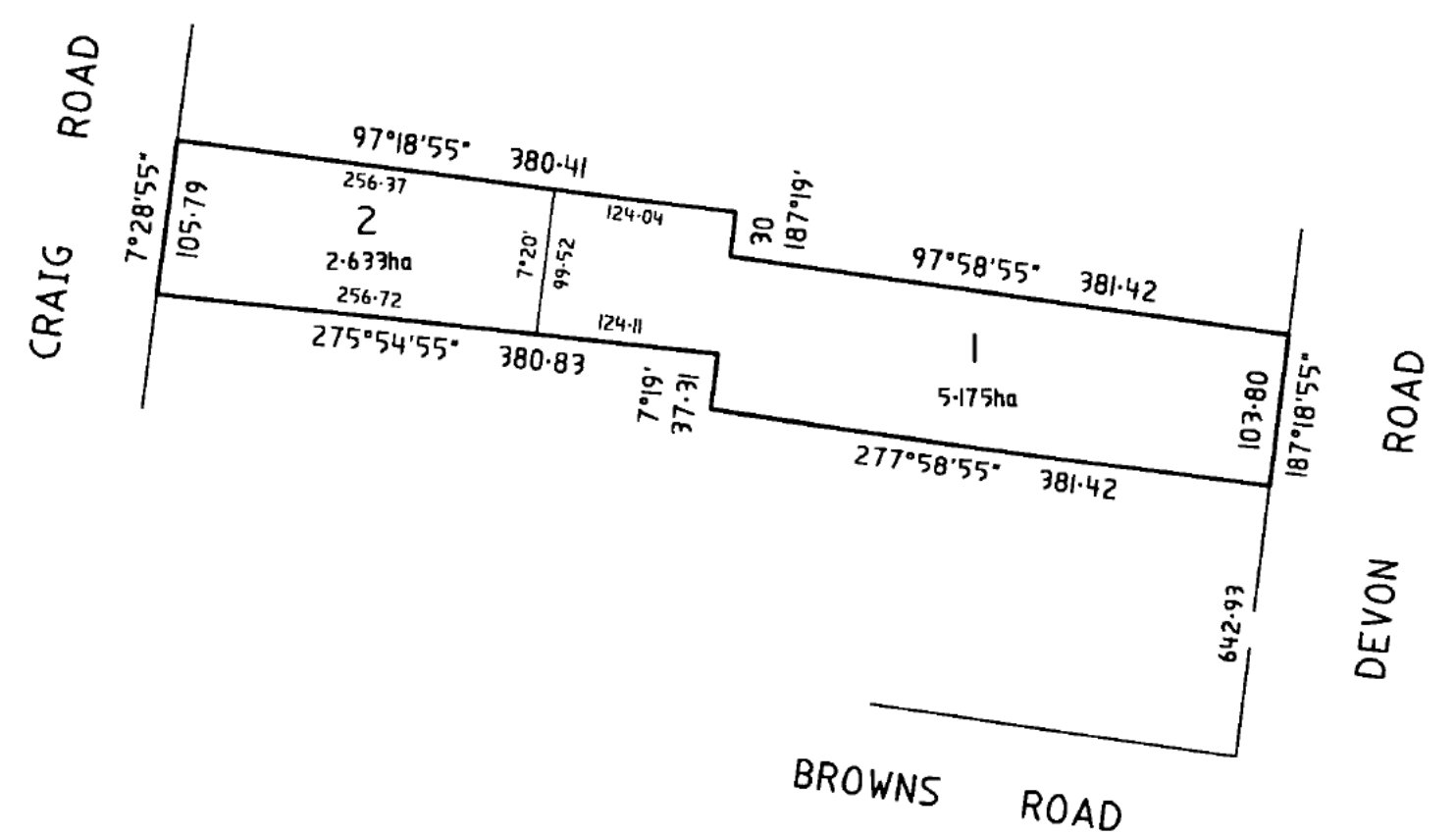
Property Details	
Address	95 Devon Road, Devon Meadows
Formal Description	Lot 1 PS613683A
Municipality	City of Casey
Site Area	5.175 ha
Zone	Farming Zone (FZ)
Overlay	n/a
Area of Aboriginal Cultural Heritage Sensitivity	Yes
Bushfire Prone Area	Yes
Melbourne Strategic Assessment Area	Yes

Title Details

95 Devon Road is formally known as Lot 1 on Plan of Subdivision 613683. There are no easements or restrictions registered on title the land.

A Section 45 notice is registered to the Certificate of Title, which relates to the application of the Melbourne Strategic Assessment Area.

Figure 3: Extract from Title – Lot 1 PS613683A





Existing Planning Controls

The land is located within the City of Casey and is subject to the provisions of the Casey Planning Scheme. The site is zoned Farming Zone – Schedule 3 (FZ3). No overlays currently apply.

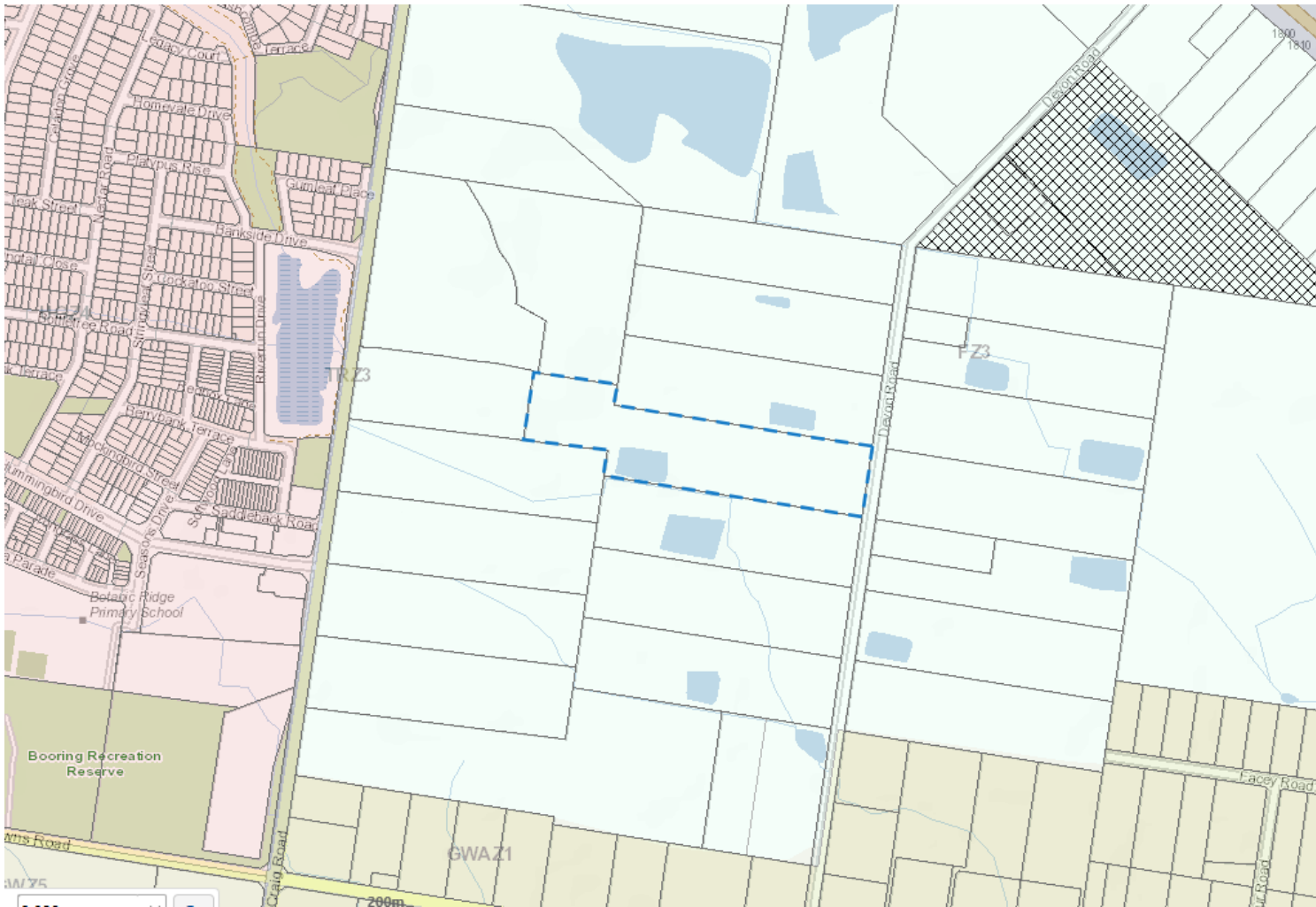
Clause 35.07 Farming Zone – Schedule 3 (FZ3)

The site is subject to the Farming Zone – Schedule 3 (FZ3). The purpose of the Urban Growth Zone is:

- To implement the Municipal Planning Strategy and the Planning Policy Framework.
- To provide for the use of land for agriculture.
- To encourage the retention of productive agricultural land.
- To ensure that non-agricultural uses, including dwellings, do not adversely affect the use of land for agriculture.
- To encourage the retention of employment and population to support rural communities.
- To encourage use and development of land based on comprehensive and sustainable land management practices and infrastructure provision.
- To provide for the use and development of land for the specific purposes identified in a schedule to this zone.

Pursuant to the current controls at Clause 35.07-1, a permit is not required for a dwelling, granted it is the only dwelling on the lot and the lot is at least 40 hectares. In accordance with Clause 35.07-3, a permit is required to subdivide land.

Figure 4: Existing FZ (Source: VicPlan)



Draft Casey Fields South (Employment) and Devon Meadows PSP & Proposed Planning Controls

Casey Fields South (Employment) and Devon Meadows PSP

The draft Casey Fields South (Employment) and Devon Meadows PSP integrates a residential precinct and an employment precinct into a single PSP process. Both precincts have distinct character and are physically separated by the South Gippsland Highway.

The draft PSP Vision applicable to Devon Meadows notes that ‘Devon Meadows will be an immersive and walkable residential community that is home to just over 11,000 residents in a seamless blend of modern urban living and natural landscape character’.

95 Devon Road is centrally located within the Devon Meadows precinct and is identified as property ID# DM67. The draft PSP indicates that the subject site will support a government secondary school on approximately two-thirds of the site with the remaining land nominated for increased and standard residential development. The school is earmarked as a medium to long-term project, partially due its encroachment into the South Gippsland Eggs separation buffer.

Proposed Planning Controls

The draft planning scheme amendment proposes to rezone the land to the UGZ15. The UGZ15 will apply Clause 32.07 – Residential Growth Zone Schedule 1 to the areas nominated for increased development and Clause 32.08 – General Residential Zone to the site to the balance of the site. The landowner supports the residential designations, but they request that the Residential Growth Zone be applied to the entire property.

The majority of the subject land is earmarked to support a government secondary school. It is submitted that the school should be relocated to the Clyde South residential precinct to better serve a larger catchment area with a single facility. The Community Infrastructure and Open Space Needs Assessment (CIOSNA) indicates low demand for a secondary school within CFS&DM, with the need primarily arising from the VPA target requiring all residential areas to be within 3.2km of a secondary school. This approach is seen as unresponsive to the local context and should be reassessed in light of the neighboring future residential PSP.

The UGZ15, Section 2.6 applies requirements for planning permit applications that seek to use and develop the land for a sensitive use located within the egg farm separation buffer. It is submitted that the separation is an impediment to the establishment of the future school, particularly because the timeframe for the cessation of the egg farm is not known. This matter adds support for the proposed relocation of the secondary school where its establishment in a more suitable location can avoid encroachment into or cause reason to apply a separation buffer.

Additionally, while residential development is considered a sensitive use, the current separation buffer covers just over half of the site. If the proposed school were removed, a larger portion of the site could be developed for residential purposes in the early years of PSP approval whilst the egg farm to continue its operations without disruption.

The non-disclosure of identified Aboriginal cultural heritage places raises concerns about the thoroughness of consideration given to the opportunities and constraints across the precinct, as well as the feasibility of realizing the proposed land uses within the PSP. This issue is further accentuated by the Aboriginal Cultural Heritage Impact Assessment (ACHIA) from Ecology and Heritage Partners, which recommends that ‘Wherever possible, and through early identification, allowances in the developments should be made to include provisions for heritage parks, conservation areas and passive open spaces which will avoid specific harm to the Places and slow the cumulative harmful impacts of development on Bunurong Country.’

Without clear guidance about the management actions to be mandated in future Cultural Heritage Management Plans (CHMP) it is submitted that the PSP should identify landownership and management requirements associated with heritage parks, conservation areas and passive open spaces if they are applied to land within the PSP post gazettal.

The staging plan proposed within the PSP delays the significant development of the PSP indefinitely. It is submitted that the staging plan should be revised to limit unnecessary delays in development, particularly if the relevant infrastructure requirements have been addressed or an alternate solution provided.



Demand for a Secondary School

The subject site benefits from a range of proposed amenities, including a local sports reserve to the immediate east, local convenience centre around 550m to the northeast and 330m (approx.) from the small local town centre within the Botanic Ridge PSP. The subject land adjoins Devon Road which will encourage active transport through the provision of shared pathways. In addition, the site is located approximately 60m north of an identified future bus capable road. The site also benefits from amenity from the nearby proposed primary school.

Due to the above, it is submitted 95 Devon Road is well suited to facilitate high density residential development across the entire property.

Despite the points raised above, the PSP designates a government secondary school over a large portion of the site. The proposed school would span across parts of two other properties, which is generally not ideal. It is understood that the Department of Education prefers to locate schools on a single property whenever possible. This raises the question of why the proposed school is positioned in its current location.

A review of the technical assessments and background reports that have informed the outcome of this PSP suggests that the school was placed in its current position to avoid various encumbrances, such as potentially contaminated land where and Environmental Audit Overlay (EAO) will be applied, future drainage alignments, separation buffers (to the extent practical), and to support an efficient road network. Given these constraints, it is submitted that there are very few available sites large enough to accommodate the proposed secondary school, and to co-locate it with a primary school and active open spaces reserves.

The PSP is informed by the Community Infrastructure and Open Space Needs Assessment – CF&DM Precincts (CIOSNA). The Assessment identifies low demand for a secondary school within CFS&DM, with only 34% of the demand needed to meet the 2051 population forecast. When compared against the PSP Guidelines, the decision to include the school seems more aligned with the VPA's Target 18, which requires all residential land to be within 3.2km of a secondary school. As such, the need for the school arises more from catchment distance requirements than from actual population demand. While the VPA's aim to meet Target 18 is acknowledged, it is argued that placing a school in an area with low demand is not a favourable land use decision, nor is it financially responsible.

Figure 5 identifies the current school location within the CFS&DM PSP and shows the 3.2km catchment area in blue. The current proposed placement of the school results in the south-eastern portion of the Casey Fields South PSP being outside of the 3.2km coverage area. The image also highlights the existing Clyde Secondary College catchment (in orange), which extends well into the Clyde South PSP and partially into the CFS&DM PSP areas. The broad reach of this catchment may explain the low demand observed within the CFS&DM PSP, and it also suggests that there may be a similar low demand for a secondary school within the Clyde South precinct.

It is evident that the current placement of the proposed secondary school on our client's land will likely trigger the need for an additional secondary school within the Clyde South PSP to service the future residents of that precinct that fall outside of the existing Clyde Secondary school catchment area. It is therefore submitted the proposed secondary school be relocated to the future Clyde South precinct where a single school could service the Devon Meadows and Clyde South catchment areas in totality.

It is submitted that re-locating the proposed secondary school will provide a net community benefit by reducing asset requirements and land allocation, making more efficient use of infrastructure and reallocating land to facilitate housing development to its maximum extent and in a timely manner.

Further, shifting the school location as proposed better meets PSP Guidelines Feature 14.3, which states *the provision of new infrastructure should [...] reflect the most cost-efficient approach to addressing service needs. This includes making use of any spare capacity of existing facilities within the catchment area.* It is submitted that allocating land for two assets when one can be delivered in a more optimal location does not support this outcome.

Figure 5: Existing school catchment (orange), VPA proposed (blue) and BW proposed catchment area to capture Clyde South residential PSP (green).

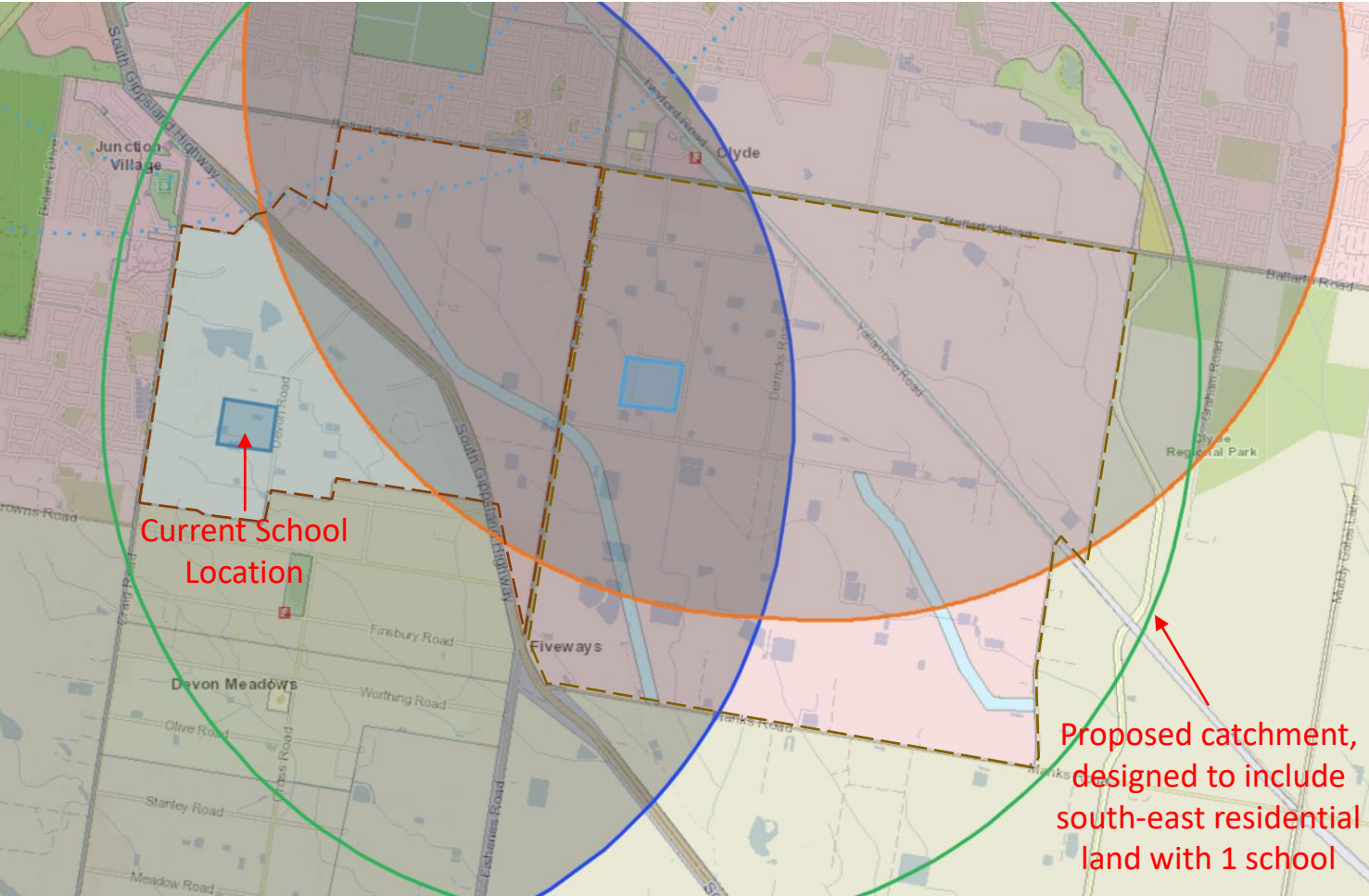


Table 1: Government Secondary College Strategy Analysis

Current VPA Outcome	BW Proposal:
2 government secondary colleges, 1 within each PSP.	1 government secondary college across both PSPs.
<ul style="list-style-type: none"><li>To ensure all residential land is within 3,200m of a government secondary school, two schools will be required (see <b>VPA Target 18</b>).</li><li>The outcome does not align with VPA PSP 2.0 <b>Feature 14.3</b>, as it fails to adopt the most cost-efficient approach. Building two schools is more expensive than constructing, resourcing and maintaining a single school.</li><li>Ineffectively responds to <b>Feature 14.3</b>, as it wastes spare capacity shown by the low demand within CFS&amp;DM PSP (34% by 2051), and ignores existing catchment overlap in Clyde South.</li><li>As a result of the above dot point, unnecessarily occupies residential land within CFS&amp;DM PSP and removes potential ICP funding to support the PSP.</li><li>Existing egg farm use rights creates an uncertain timeframe regarding the use and construction of a school in the location proposed.</li></ul>	<ul style="list-style-type: none"><li>One government secondary college can be positioned to cover the entire CFS&amp;DM and Clyde South PSPs, while meeting <b>VPA Target 18</b> (see green catchment on figure 5).</li><li>Better meets <b>Feature 14.3</b> by ensuring that new infrastructure reflects the most cost-efficient approach through the construction of a single school.</li><li>Supports <b>Feature 14.3</b> further, by better utilising spare capacity evident from the low demand within CFS&amp;DM PSP (34% by 2051), and the existing overlap of the Clyde Secondary College.</li><li>Allows additional land for residential purposes within CFS&amp;DM PSP which will help offset development costs associated with significant infrastructure within the precinct.</li><li>Flexibility in location to avoid development constraints within the Clyde South PSP.</li><li>Additional NDA will support the CFS&amp;DM precinct's role to provide housing and reduce ICP costs.</li></ul>

Sensitive use separation buffer

The existing South Gippsland Egg farm is located directly opposite the subject land at 100 Devon Road. The proximity of the farm to the subject site will place the proposed school with the farm's separation buffer. The Odour, Dust and Noise Assessment prepared by GHD to inform the PSP notes the following:

*'South Gippsland Egg Farm has a maximum capacity of 40,000 birds. GHD notes that the separation distance must be calculated based on the maximum permitted number of birds for each farm. Even in the event current bird numbers are lower than the maximum permitted value, the separation distance needs to account for the future possibility the site may hold the permitted maximum numbers'.*

The greatest calculated separation distances from the boundary of the boundary of South Gippsland Eggs is 306m.

The egg farm is operating lawfully and will retain its existing use rights following the gazettal of the CFS&DM PSP. There is no indication that the farm plans to cease operations in Devon Meadows, which creates an uncertain timeline for the Department of Education to establish a school in the proposed location. Moreover, with only 34% demand for a school in Devon Meadows, Halit Flowers is concerned that their site may ultimately be deemed unviable due to these factors. This situation could lead to years of ongoing land holding costs and levies while waiting for the Department of Education to either purchase the land or confirm that it is no longer required which ultimately creates a significant financial burden for our client.

It is submitted that the proposed relocation of the secondary school is a more logical, justified and cost effective approach to delivery of infrastructure to service the Devon Meadows and the Clyde South communities in the future.

Staging of the Precinct and Delivery of Infrastructure

The delivery of the school is expected to be delayed due to several factors outlined in the draft PSP. The subject site is located within Stage 2a, as indicated on PSP Plan 9 – Infrastructure and Development Staging. Notably, the nearby egg farm is also within Stage 2, meaning there is no reason or incentive for the egg farm to cease operations before development and land uses begin in Stage 2, as their operations would experience little change.

Further, the odour assessment prepared by GHD advises that the government secondary school should not be developed until the nearby egg farm has ceased its operations. The report highlights that the secondary school site falls within the separation distance of South Gippsland Eggs and will likely experience odour or dust impacts from the farm's ongoing operations. Therefore, the establishment of the secondary school is contingent on the closure of the South Gippsland Eggs Devon Meadows facility.

Finally, the PSP identifies the development of the school as a medium to long term project.

It is submitted that the staging plan should be revised to allow for more development across the precinct shortly after PSP gazettal. This can be achieved by removing all unnecessary restrictions on the timing of development for land that is not tied to a specific infrastructure need. It is submitted that the proposed staging plan does not support the timely delivery of housing within the precinct nor affordability, as it creates unnecessary delays and financial burdens on developers and landowners. This will ultimately increase costs and limit the availability of housing in the area.

Supporting PSP Guideline Feature 17.1, it is requested that the South Gippsland Egg Farm be moved to Stage 1 to provide an incentive for the timely closure of its operations, which is essential for unlocking development in both Stage 1a and Stage 2a. Without a clear incentive, there is a risk that the egg farm will continue operating until residential development starts to encroach on the facility. Retaining the egg farm within Stage 2a could further delay development across the wider Stage 2a area, so it is requested that an incentive be provided to facilitate the closure of the egg farm and allow for timely development.

Aboriginal Cultural Heritage

The VPAs website states that The 2.0 process aims to:

- Co-design of a Place-Based Plan
- Achieve up-front, early resolution of issues
- Gain better and earlier information on infrastructure demands to inform agency planning and budget bids
- Update guidance on PSP content reflecting new government policy and promoting innovation
- Provide stronger guidance in PSPs for staging of development

The unknown location and the extent of land required to protect the 12 identified places of Aboriginal Cultural Heritage creates uncertainty regarding whether the land uses proposed across the PSP can be realistically achieved.

*The PSP guidelines articulately detail their aim provide Achieve up-front, early resolution of issues. In its closing summary the Aboriginal Cultural Heritage Impact Assessment (ACHIA) that has been prepared to support the PSP states:*

*'In recent years, archaeological salvage was considered to be an acceptable management condition. However, salvage itself is harm and for this reason is now considered a last resort management condition applied only where a development absolutely cannot avoid impact. Instead, the preferred management condition in place of salvage is the establishment of heritage parks, conservation zones or minimally landscaped passive open spaces'.*

Further, Recommendation 3 notes:

*'Map 12 should be used as a starting point for designating open spaces. However, Map 12 provides indicative and likely locations for Aboriginal cultural heritage and should be ground-truthed with a formal archaeological survey prior to incorporation in PSP development planning'.*

It is understood that the *likely locations for Aboriginal cultural heritage have yet to be ground-truthed with a formal archaeological survey.* Accordingly, if it is the VPAs intention to areas of cultural heritage into heritage and conservation parks and open space reserve, how will changes to the PSP and potentially the DSS be fairly and transparently communicated with the landowners right to respond to potentially significant changes to the designated land uses and NDA on their site.

It is submitted that the current locations of the 12 identified places of Aboriginal Cultural Heritage should be clearly identified to allow for a comprehensive analysis of the precinct's features. This will help inform land use outcomes and highlight areas of constraint within the PSP. Furthermore, it is submitted that the PSP must specify the ownership and management requirements to be applied if heritage parks, conservation areas, and open space reserves are required within a future Cultural Heritage Management Plan (CHMP) to protect Aboriginal cultural heritage.

We request the opportunity to make a further submission regarding Aboriginal cultural heritage should additional information be provided during the PSP planning scheme amendment process.



Conclusion

Hailt Flowers is generally supportive of the overall concept of the PSP and the residential designation across a portion of the subject land. However, the range of amenities existing and proposed in proximity to 95 Devon Road supports further residential increases across the entire property. It is submitted that a more intense housing stock should be nominated across the subject land to further contribute to the State Government's Housing targets.

The majority of the subject site is earmarked as a future government secondary school which Halit Flowers does not support.

The Community Infrastructure and Open Space Needs Assessment provides minimal justification for establishing a secondary school in its current location, showing that the precinct will only generate 34% of the expected demand for the school by 2051. The decision to place the school in this location seems to be primarily influenced by the VPAs goal of ensuring all homes are located within 3.2km of a secondary school, as outlined in the Precinct Structure Planning Guidelines Target 18.

Looking more broadly, it is submitted that the proposed secondary school can be more appropriately located within the future Clyde South Residential PSP where it can service the Devon Meadows PSP catchment as well as the entire Clyde South PSP catchment. Specifically, the relocation would eliminate the need for an additional government secondary school within the Clyde South Precinct, as it would encompass the southeast portion of the Clyde South PSP, which is currently outside the service area of Clyde Secondary College.

It is further submitted that reducing the number of schools required from two to one will support VPA PSP 2.0 Feature 14.3, ensuring that services are delivered in an efficient and cost-effective manner. This approach will also free up additional developable land for residential purposes within Devon Meadows, which is considered a heavily constrained precinct.

The landowner of 95 Devon Road strongly advocates for the PSP to notate guidelines and expectations around management requirements and landownership responsibilities if future CHMPs are to require the protection of Aboriginal cultural heritage within heritage parks, conservation areas and open space reserves.

The PSP proposes a staging plan to ensure drainage infrastructure is in place before development in the Casey Fields South and Devon Meadows areas. The plan as currently proposed is likely to cause precinct wide delays. In addition, the nearby egg farm is located within Stage 2, meaning there is no reason or incentive for the egg farm to cease operations before development and land uses begin in Stage 2, as their operations would experience little change.

It is suggested that removing unnecessary restrictions on the timing of development for land not tied to specific infrastructure needs could lead to greater efficiencies in the development process. Furthermore, relocating the South Gippsland Egg Farm to Stage 1 could incentivize the timely closure of its operations, which is crucial for unlocking development in both Stage 1a and Stage 2a.