

HOBSONS BAY PLANNING SCHEME

AMENDMENT C86

EXPLANATORY REPORT

Who is the planning authority?

This amendment has been prepared by the Minister for Planning, who is the planning authority for this amendment.

The amendment has been initiated by the Department of Planning and Community Development following the recommendations of the Minister's Advisory Committee for the Former Port Phillip Woollen Mills.

Land affected by the amendment

The amendment applies to Precinct 20 as defined by the Hobsons Bay Industrial Land Management Strategy 2008 (ILMS). Specifically the amendment applies to the following properties:

- 1, 3-39, 41, 57 and in part 2-10 Nelson Place, Williamstown;
- 17 and 21 Ann Street, Williamstown; and
- 15, 23, 25 and 27 Aitken Street, Williamstown.

What the amendment does

The amendment introduces the following changes:

- Rezones that part of Precinct 20 that forms the boundary to Kanowna Street and Nelson Place to Mixed Use Zone;
- Applies the Design and Development Overlay Schedule 11, and the Environmental Audit Overlay to all of Precinct 20; and

Strategic assessment of the amendment

• Why is the amendment required?

The amendment is required to implement the recommendations of the Advisory Committee for the Former Port Phillip Woollen Mills.

• How does the amendment implement the objectives of planning in Victoria?

The Amendment will achieve the objectives of planning in Victoria in section 4 of the *Planning and Environment Act 1987*, in particular section 4(1)(a), by providing for economic and sustainable use and development of land in a fair manner, section 4(1)(e), by allowing development in accordance with the objectives in the preceding subsections, and section 4(1)(g), in that it also balances the present, and, in particular, future interests of all Victorians. It will also balance the objectives of the planning framework, including the objectives in section 4(2)(c), 4(2)(e), 4(2)(g) and 4(2)(h).

- **How does the amendment address the environmental effects and any relevant social and economic effects?**

The amendment addresses any possible environmental affects through the extension of an Environmental Audit Overlay to the Precinct 20. There are no foreseen or economic social effects.

- **Does the amendment comply with the requirements of any Minister's Direction applicable to the amendment?**

The amendment is consistent with the Ministerial Direction on the Form and Content of Planning Schemes issued under section 7(5) of the Act.

The amendment is affected by Ministerial Direction No 1 - Potentially Contaminated Land. Precinct 20 has potential for contamination given its previous industrial use. An EAO has been applied to the Precinct 20 to ensure compliance with this Direction. A statement or certificate of environmental audit needs to be submitted as required by this Direction prior to a sensitive use taking place on the site.

The amendment is affected by Ministerial Direction No 11 Strategic Assessment of Amendments and complies with the requirements as set out in this explanatory report.

- **How does the amendment support or implement the State Planning Policy Framework?**

The amendment meets the relevant directions of the SPPF as discussed below:

Clause 11: Settlement

The precinct is considered a strategic redevelopment area in the ILMS and the amendment will allow for the redevelopment of the precinct in accordance with the ILMS. Consequently the rezoning of the Precinct 20, application of EAO and DDO11 will help alleviate housing stress by providing more dwellings in an established area.

Clause 13: Environmental Risk

The provision of an EAO for the Precinct 20 will ensure that land will be suitable for sensitive land uses. The site is within the vicinity of State significant industry that emits noise, potential vibration and odour. The provisions within DDO11 recognise this and provides guidance on how to address these issues to ensure that future residents are not detrimentally impacted.

Clause 15: Built Environment and Heritage

The amendment does not remove any of the Heritage Overlays that currently affect Precinct 20. The amendment does update the Schedule of the Heritage Overlay that will allow for buildings that are deemed to be of cultural and or heritage significance to remain whilst new adaptive uses occur within these buildings. When DDO11 is considered in conjunction with the remaining guidelines and assessments within the Scheme it will provide for sufficient guidance to ensure that any future development is sustainable and considers the heritage and possible archaeological values of the precinct.

Clause 16: Housing

The amendment will allow Precinct 20 to be utilised for housing choices which are anticipated to meet community needs. The application of the R1Z and the DDO11 will ensure that future housing will be well designed and provide for housing diversity.

How does the amendment support or implement the Local Planning Policy Framework?

The Amendment will implement the objectives of the Local Planning Policy Framework in the following areas:

Clause 21.05 – The Vision

The amendment helps achieve the vision for the municipality as outlined in this Clause by promoting urban form that is contemporary, innovative and sustainable which respects the existing neighbourhood character where appropriate.

Clause 21.06-1 – Residential

The amendment will allow for a choice of housing types to help meet the needs of the diverse households in the municipality. Dwelling styles and designs will contribute to preferred neighbourhood character by harmonising with existing buildings and also by architectural innovation, uniqueness and excellence. The provisions within DDO11 and the remainder of the Scheme ensure that future development will respect and enhance the preferred neighbourhood character.

Clause 21.07– Heritage

The amendment does not remove any heritage controls from the site. With the retention of existing Heritage Overlays and the updated Heritage Overlay Schedule, the amendment will ensure that any new development in Precinct 20 will not diminish the existing heritage values whilst allowing adaptive uses within buildings of heritage significance.

Clause 22.02 – Industry

The extension of the Environmental Audit Overlay will ensure that any potential effects from the previous industrial uses of the site will be addressed to allow for effective and safe implementation of Hobsons Bay Industrial Land Management Strategy 2008.

The provisions within the DDO11 recognise that surrounding industrial land uses are of State significance and that any development within Precinct 20 will ensure that it has been appropriately developed to achieve a reasonable amenity outcome for its residents.

• Does the amendment make proper use of the Victoria Planning Provisions?

The amendment request utilises the appropriate planning tools within the Victorian Planning Provisions to ensure that the strategic direction and opportunities for Precinct 20 can be achieved within the appropriate planning framework offered by the Victorian Planning Provisions. In that regard the amendment applies the following zone and overlay controls Precinct 20:

- Mixed Use Zone
- Environmental Audit Overlay
- Design and Development Overlay Schedule 11

• How does the amendment address the views of any relevant agency?

As part of the Advisory Committee process, relevant government agencies and authorities were given the opportunity to make a submission and their views have been recorded in the Advisory Committee report. In this regard, the Amendment provides for an outcome where the relevant issues have been reasonably considered and the views of the affected parties known.

- **Does the amendment address relevant requirements of the Transport Integration Act 2010?**

The amendment is unlikely to impact on the transport system as defined by section 3 of the Transport Integration Act 2010. Controls within the DDO11 will ensure that any impacts on the transport system will be adequately managed.

Resource and administrative costs

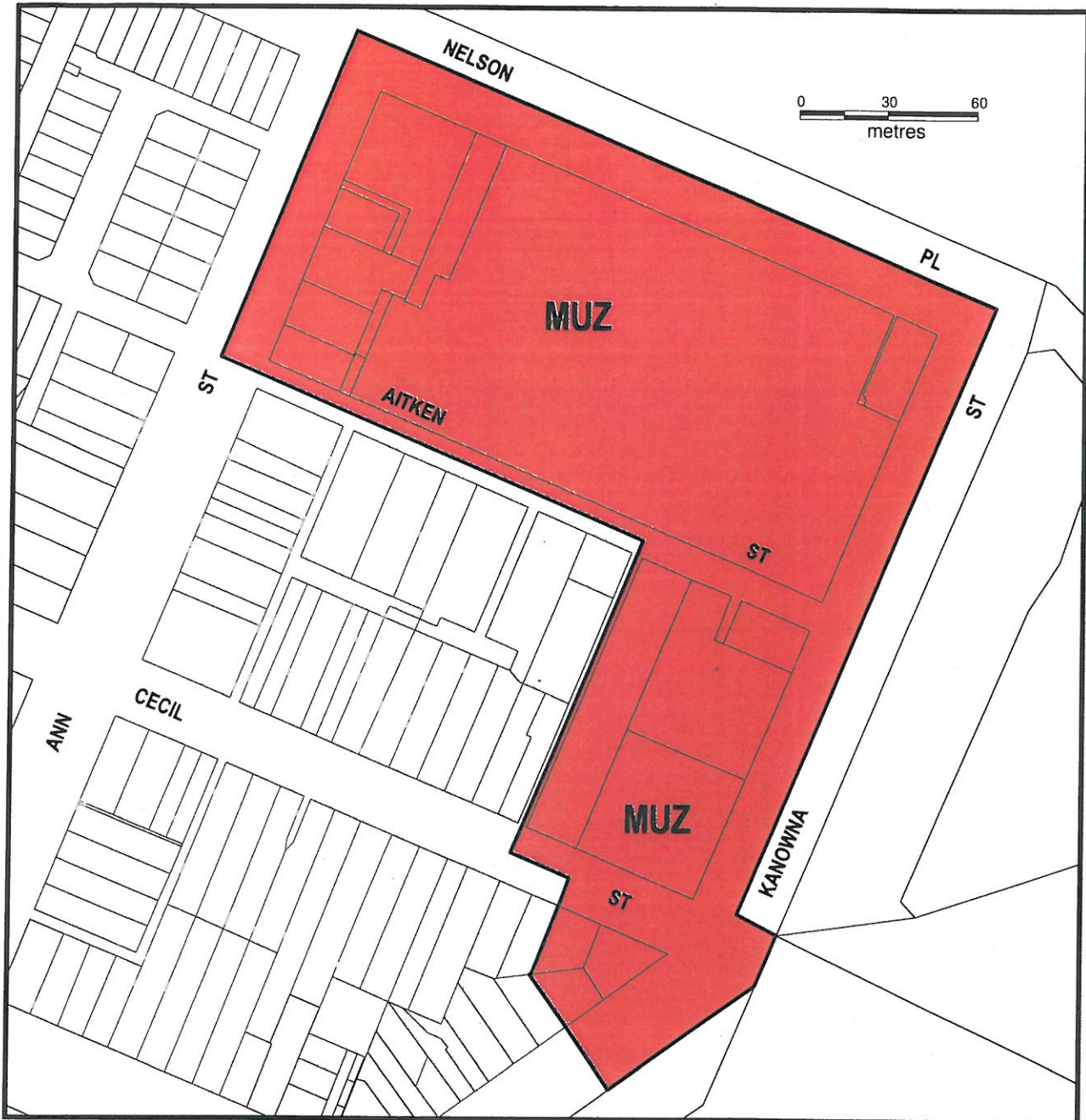
- **What impact will the new planning provisions have on the resource and administrative costs of the responsible authority?**

It is possible that the amendment will initially result in increased administrative costs however, this is considered necessary to control the development of Precinct 20 as per the recommendations of the Advisory Committee.

Where you may inspect this Amendment

A copy of the amendment can be inspected, free of charge, at the Department of Planning and Community Development web site at www.dpcd.vic.gov.au/planning/publicinspection and free of charge, during office hours, at the offices of the Hobsons Bay City Council, 115 Civic Parade, Altona

HOBSONS BAY PLANNING SCHEME LOCAL PROVISION



Part of Planning Scheme Map 19

LEGEND

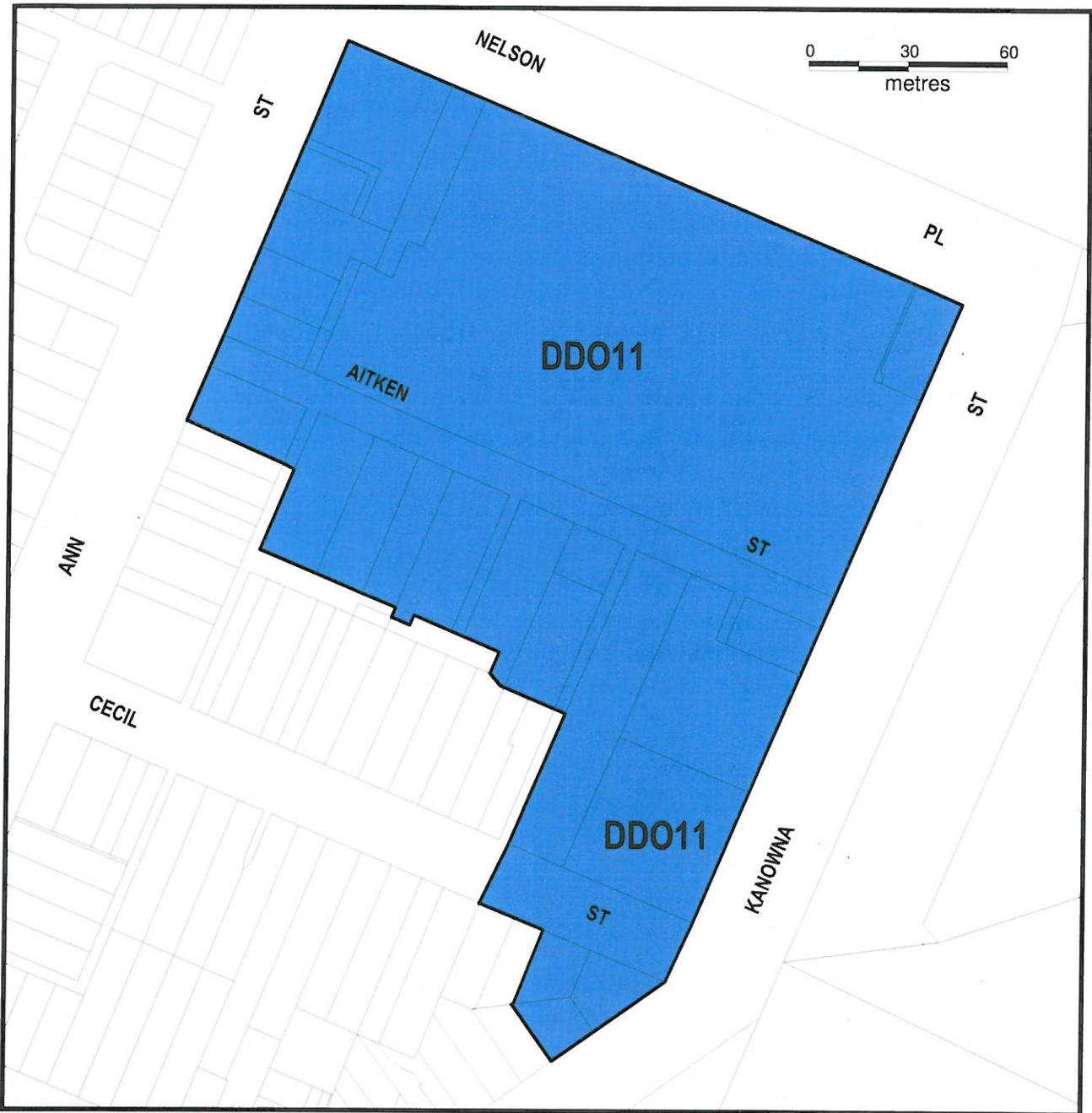
MUZ MIXED USE ZONE

AMENDMENT C86

PREPARED BY: INFORMATION SERVICES
Statutory Systems
Planning, Heritage and Urban Design
Department of Planning and Community Development



HOBSONS BAY PLANNING SCHEME LOCAL PROVISION



Part of Planning Scheme Map 19DDO

LEGEND

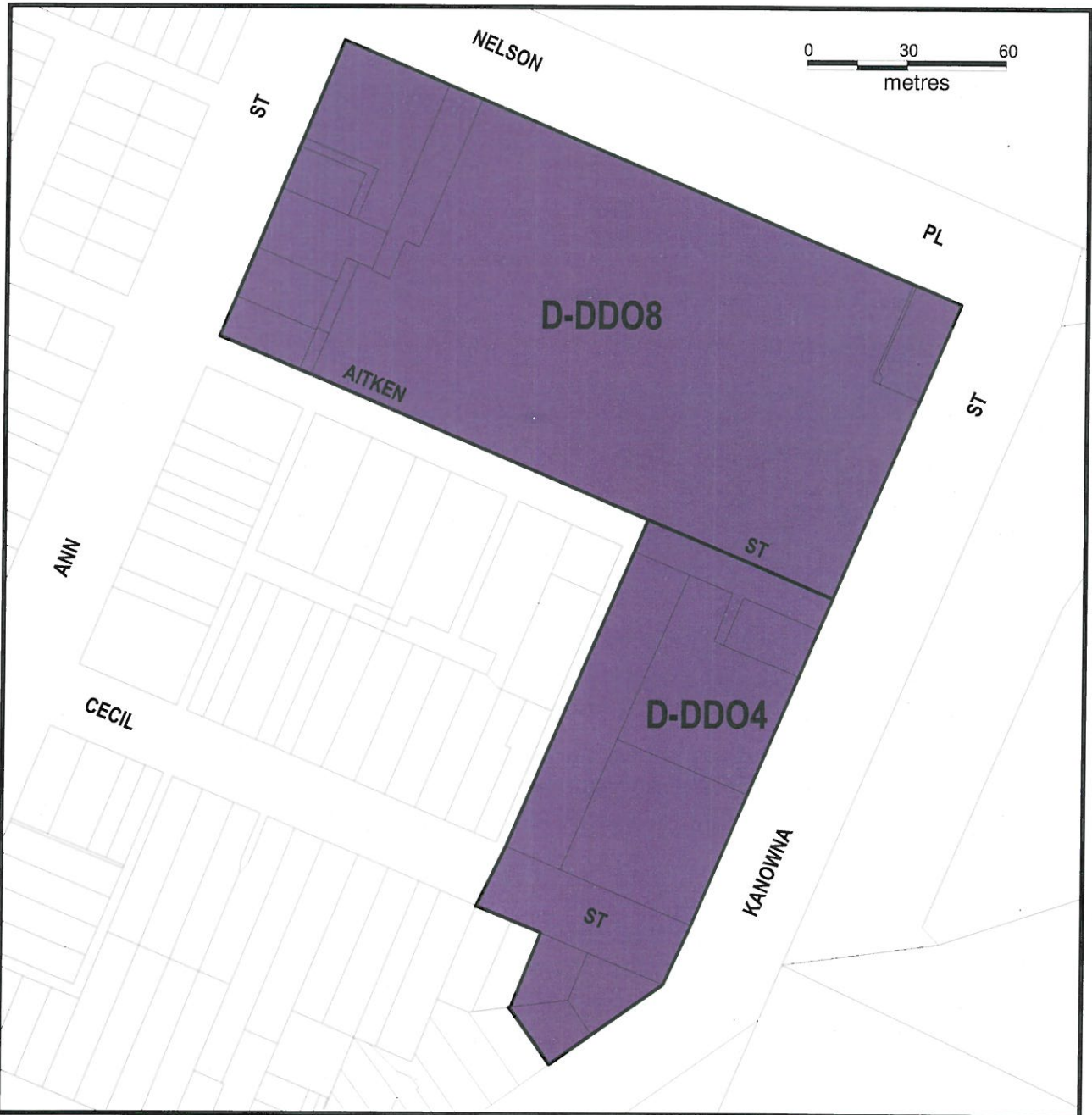
| | |
|---|--|
|  | DDO11 DESIGN AND DEVELOPMENT OVERLAY - SCHEDULE 11 |
|---|--|

AMENDMENT C86

PREPARED BY: INFORMATION SERVICES
Statutory Systems
Planning, Heritage and Urban Design
Department of Planning and Community Development




HOBSONS BAY PLANNING SCHEME LOCAL PROVISION



Part of Planning Scheme Map 19DDO

LEGEND

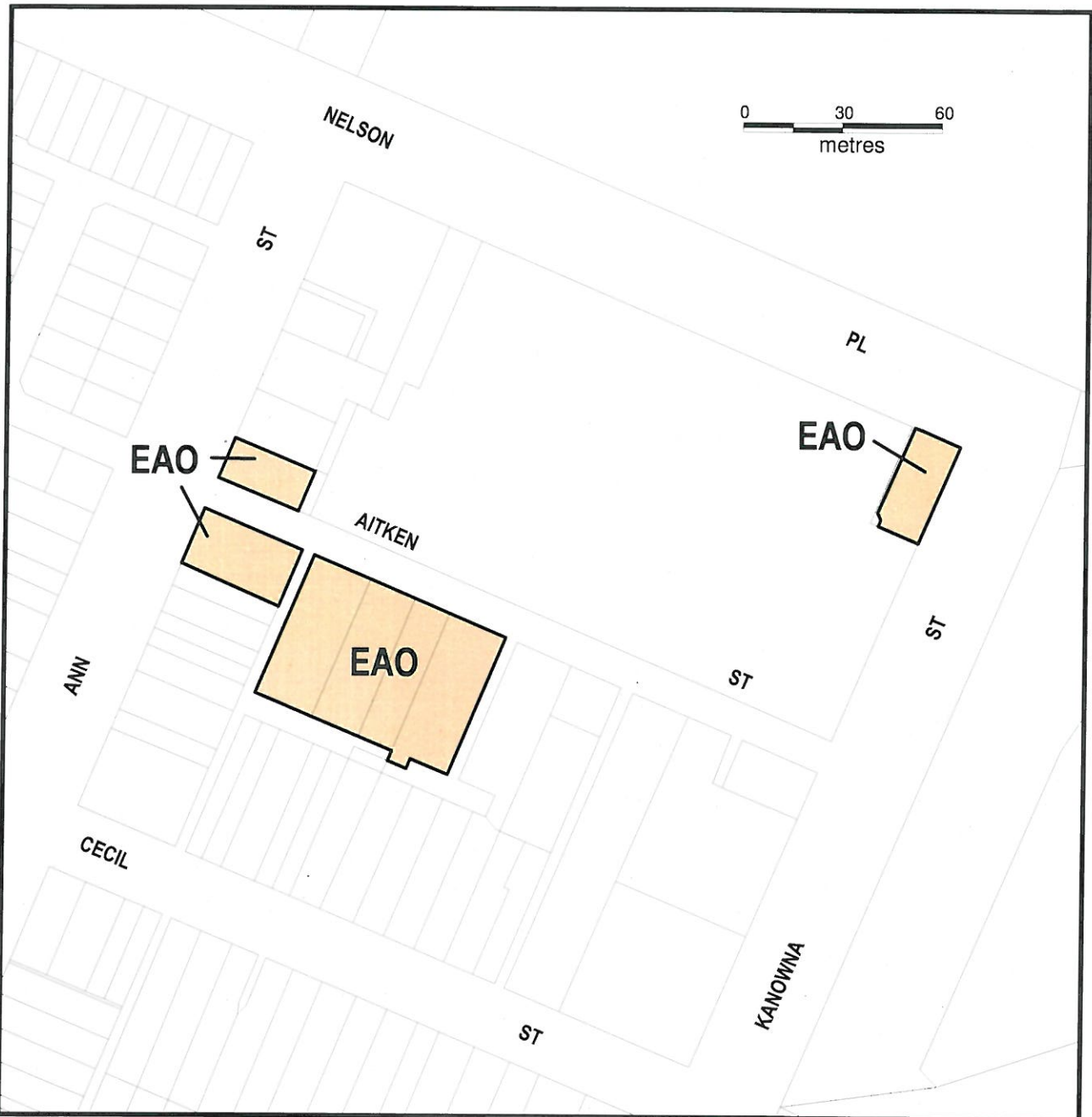
| | |
|---|---|
|  | AREA TO BE DELETED FROM A DESIGN AND DEVELOPMENT OVERLAY |
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AMENDMENT C86

PREPARED BY: INFORMATION SERVICES
Statutory Systems
Planning, Heritage and Urban Design
Department of Planning and Community Development



HOBSONS BAY PLANNING SCHEME LOCAL PROVISION



Part of Planning Scheme Map 19EAO

LEGEND

 EAO ENVIRONMENTAL AUDIT OVERLAY

AMENDMENT C86

REASONS FOR DECISION TO EXERCISE POWER OF INTERVENTION

UNDER SECTION 20(4) OF THE PLANNING AND ENVIRONMENT ACT 1987

HOBSONS BAY PLANNING SCHEME AMENDMENT C86

The Planning and Environment Act 1987, the Heritage Act 1995 and the Victorian Civil and Administrative Tribunal Act 1998 provide for the intervention of the Minister for Planning in planning and heritage processes.

In exercising my powers of intervention, I have agreed to:

- Make publicly available written reasons for each decision; and
- Provide a report to Parliament at least every twelve months detailing the nature of each intervention.

REQUEST FOR INTERVENTION

1. I have received the advice of the Advisory Committee in relation to the Former Port Phillip Woollen Mills site in Williamstown. The previous Minister for Planning appointed the Advisory Committee using section 151 of the *Planning and Environment Act 1987* (the Act) to advise on appropriate planning controls for redevelopment of the site known as Precinct 20 in the *Hobsons Bay Industrial Land Management Strategy 2008*, which includes the former Woollen Mills Site.
2. The Advisory Committee was required to provide an opportunity for interested parties and the proponent to be heard in relation to redevelopment of the Precinct. The Advisory Committee was to provide a coordinated and facilitated planning assessment approach to allow the redevelopment of Precinct 20 as it is a strategic redevelopment site having regard to the Government's strategic planning policy framework.
3. DPCD has recommended a planning scheme amendment (C86 to the Hobsons Bay Planning Scheme) to give effect to many of the Committees recommendations. The amendment introduces the following changes:
 - Rezones that part of Precinct 20 that forms the boundary to Kanowna Street and Nelson Place to Mixed Use Zone;
 - Applies the Design and Development Overlay Schedule 11, and the Environmental Audit Overlay to all of Precinct 20; and

WHAT POWER OF INTERVENTION IS BEING USED?

4. As Planning Authority, I have decided to prepare a planning scheme amendment and exercise my power under section 20(4) of the Act exempting myself from all the requirements of sections 17, 18 and 19 of the Act and the Regulations in respect to Amendment C86 to the Hobsons Bay Planning Scheme.
5. In deciding whether to exercise this power, section 20(4) of the Act requires that the Minister must consider either that compliance with any of those requirements is not warranted or that the interests of Victoria or any part of Victoria make such an exemption appropriate.

BACKGROUND

6. The former Minister for Planning approved Amendment C75 to the Hobsons Bay Planning Scheme in April 2010. This amendment rezoned the former Port Phillip Woollen Mills site on Nelson Place, Williamstown from an Industrial 1 Zone to a Residential 1 Zone and applied an Environmental Audit Overlay.

7. On 27 May 2010 an Advisory Committee was appointed by the former Minister for Planning under to Section 151 of the *Planning and Environment Act 1987*. The Committee was asked to review planning and urban design matters relating to the proposed redevelopment of the former Port Phillip Woollen Mills, Nelson Place in Williamstown.
8. The Committee was also asked to review planning and urban design matters relating to the land to the south of Nelson Place, within Precinct 20 as identified under the Hobsons Bay Industrial Land Management Strategy 2008.
9. The Committee held hearings from September 2010 to March 2011.
10. The Committee's final report, containing findings and recommendations was delivered on 10 May 2011.

BENEFITS OF EXEMPTION

11. The main benefit of the exemption will be to enable a prompt decision on the adoption and approval of the Amendment, and will avoid the time and expense associated with the process which would otherwise apply under the Act.
12. The site is a strategic redevelopment site within the context of State Government policies and Council's local policies. The fast tracking of the planning scheme amendment will facilitate the timely development of the site.
13. This is a precinct urgently in need of redevelopment and some form of a residential outcome is the best use of the land. The site has a peculiar mix of interfaces ranging from robust industrial built form on one side, to an open air car park on another, to a windswept coastal park of undoubted historic significance, to low rise Victorian cottages and to modern residential town houses. The same precinct hosts a working shipyard of state significance, a crude oil tank farm, a late night entertainment venue, remnant light industrial uses and an attractive residential neighbourhood.
14. The Committee concluded that the locational context lends itself to a denser form of development than is currently allowed by the existing planning controls.
15. The targeted consultation carried out in relation to the Former Port Phillip Woollen Mills proposals provided an opportunity for those persons who may be materially affected by the proposal and amendments to the planning scheme to make a submission and to be heard by the Advisory Committee.
16. The amendment would enable the implementation of many of the strategic planning objectives set out in the Planning Scheme and is consistent insofar as relevant with strategic policies set out in the Local Planning Policy Framework of the Hobsons Bay Planning Scheme.

EFFECTS OF EXEMPTION ON THIRD PARTIES

17. The effects of the exemption will be that people will not have the opportunity to make submissions after the preparation of the Amendment, nor to be heard by a panel in relation to the Amendment.
18. The exemption will have a minimal impact on third parties given the targeted consultation and Advisory Committee process that has occurred in relation to the site and precinct.
19. In particular, as part of the Advisory Committee process, land owners and occupiers of abutting or adjoining properties, Hobsons Bay Council and relevant government authorities were given the opportunity to make a submission and their views have been recorded for my consideration in the Advisory Committee report. In this regard, the Amendment provides for an outcome where the relevant issues have been reasonably considered and the views of the affected parties known.

ASSESSMENT AS TO WHETHER BENEFITS OF EXEMPTIONS OUTWEIGH EFFECTS ON THIRD PARTIES

20. Having regard to the Advisory Committee process which provided an opportunity for affected parties to be heard, the views of affected parties have been considered.
21. The Amendment complies with the following planning objectives as set out in Section 4 of the Act:
- 4(1)(a) to provide for the fair, orderly, economic and sustainable use, and development of land;
 - 4(2)(c) to enable land use and development planning and policy to be easily integrated with environmental, social, economic, conservation and resource management policies at State, regional and municipal levels;
 - 4(2)(e) to facilitate development which achieves the objectives of planning in Victoria and planning objectives set up in planning schemes; and
 - 4(2) (g) to encourage the achievement of planning objectives through positive actions by responsible authorities and planning authorities.
22. Given that the proposals promote strategic planning policies at the State and local level, deliver economic and community benefits, and that the views of Council and relevant persons and agencies have been considered, I am satisfied that it is appropriate to exempt myself from the usual notice requirements of sections 17, 18 and 19 (96C as relevant) of the Act on the basis that compliance with the requirements is not warranted.
23. I consider that that the benefit of the proposed exemption by speeding up the planning process outweighs any adverse effects on third parties of not being able to comment on the draft controls because they have already had ample opportunity to comment on the controls for the site through the Advisory Committee process.

DECISION

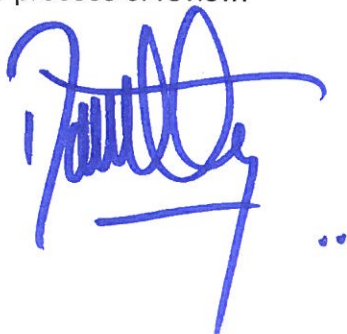
24. I have decided to exempt myself from the requirements of:
- Sections 17, 18 and 19 of the *Planning and Environment Act 1987* and the Regulations in respect to Amendment C86 to the Hobsons Bay Planning Scheme.

REASONS FOR INTERVENTION

25. I provide the following reasons for my decision to exercise my power under section 20(4) of the *Planning and Environment Act 1987*.
26. I am satisfied that -
- compliance with any of the requirements of sections 17, 18 and 19 of the Act and the regulations is not warranted*
- because:
- The matter will give effect to an outcome where targeted consultation has been carried out with stakeholders and relevant issues have been reasonably considered by a Section 151 Advisory Committee and the views of affected parties are known;
 - The proposed planning scheme amendment has been the subject of a robust and rigorous process of review.

MATTHEW GUY MLC
Minister for Planning

Date: 25.11.11



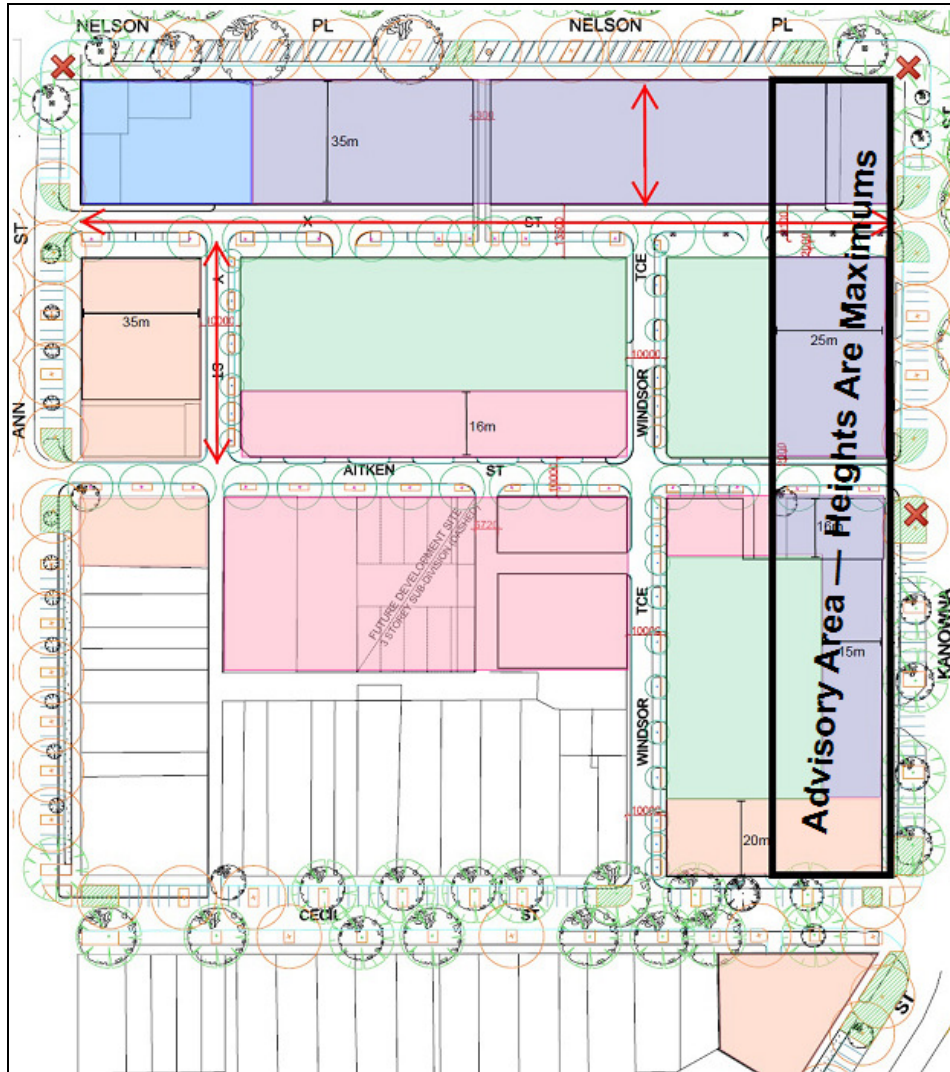
SCHEDULE 11 TO THE DESIGN AND DEVELOPMENT OVERLAY

Shown on the planning scheme map as DDO11

PRECINCT 20 - FORMER PORT PHILLIP WOOLLEN MILLS AND SURROUNDS

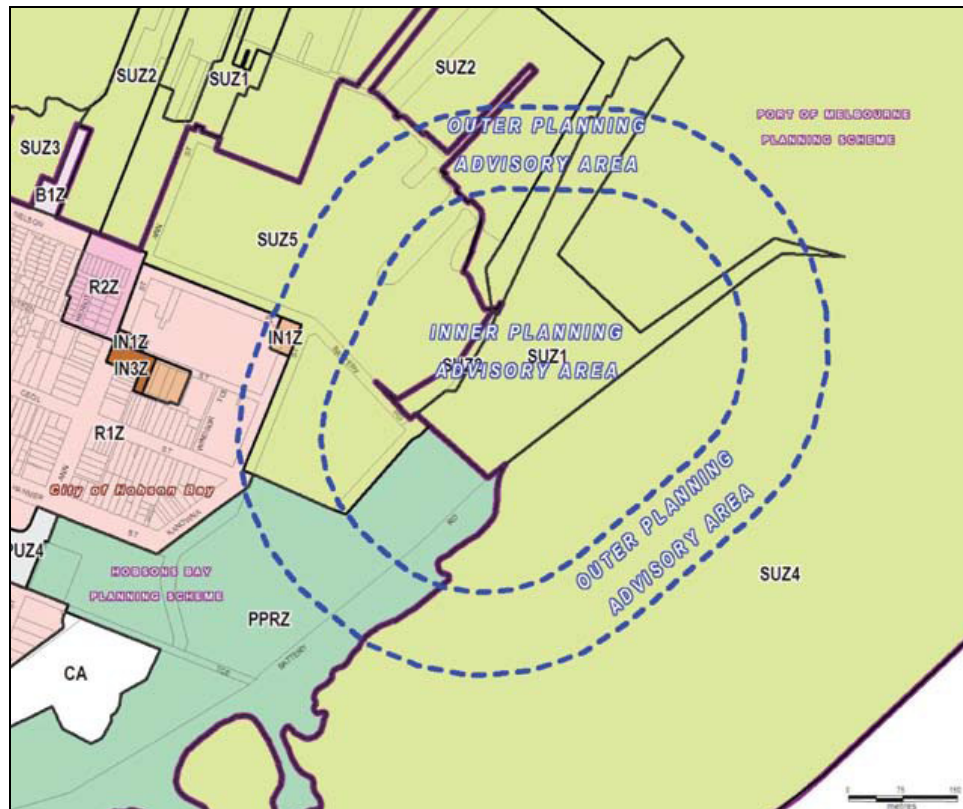
1.0 Design and Development Plan and Indicative Heights

---/2011
C86



- | | | | | | | | |
|--|---------------------------------------|--|---|--|------------------------------------|--|--|
| | Pedestrian Activity/ Meeting Point | | Local Streetscapes 10m Building Height | | Urban Edges 13m Building Height | | Nelson/Ann Corner 19m Building Height |
| | New Streets | | Aitken Corridor 13m Building Height | | Central 25m Building Height | | |

2.0 Design and Development Plan Advisory Area



Note: Zoning is irrelevant

3.0 Design Objectives

- To encourage comprehensive urban renewal which delivers increased housing diversity, affordability and density within Williamstown.
- To create a residential area which is contemporary in design and provides a transition from surrounding 19th Century residential areas.
- To encourage development which achieves high quality urban design outcomes through provision of buildings of architectural excellence located in pleasant street environments.
- To recognise the historic, environmental, conservation and recreation significance of the area.
- To protect state-significant operations of the Williamstown Shipyard Site, the Gellibrand Tank Farm and the Port of Melbourne.
- To preserve the foreshore reserve and significant public open spaces including the Point Gellibrand Coastal Heritage Park.
- To maintain and enhance key views and vistas.
- To ensure that the height, scale, bulk and setback of new development is respectful of the context of the area.
- To ensure that any buildings that are used for residential and other noise sensitive uses are appropriately designed with noise attenuation measures.
- To encourage adaptive re-use of heritage buildings.
- To discourage development in the WorkSafe Planning Advisory Areas that attracts or accommodates significant numbers of people and which cannot respond to an emergency.

4.0 Buildings and works

A permit is required to construct a building or to construct or carry out works.
Buildings and works should be generally in accordance with this schedule.

5.0 Building Height

Buildings should be constructed generally in accordance with the indicative building heights specified in the Table to this schedule.

Within the Advisory Area (illustrated in clause 1 of this schedule) building heights specified in the Table to this schedule represent maximum building heights which cannot be exceeded even with permit.

The height of a building or works is the height measured at its highest point above the permanent footpath at the centre of the site frontage. If there is no footpath, the natural surface level at the centre of the site frontage is the base level.

6.0 Noise Attenuation

Habitable rooms of new dwellings adjacent to high levels of external noise should be designed to limit internal noise levels to a maximum of 45 dB in accordance with relevant Australian Standards for acoustic control.

7.0 Notice and review provisions

An application to construct a building or construct or carry out works outside the Advisory Area (Both Inner and Outer Planning Advisory Areas) that is generally in accordance with the provisions of this Schedule is exempt from the notice requirements of Section 52(1)(a), (b) and (d), the decision requirements of Section 64(1), (2) and (3) and the review rights of Section 82(1) of the Act.

Before deciding on an application, the Responsible Authority should seek the views of the following:

- the owner and occupier of the Williamstown Shipyard Site;
- the owner and occupier of the Gellibrand Tank Farm;
- the Port of Melbourne Corporation;
- Work Safe Victoria;
- the EPA; and
- owners and occupiers of adjoining/abutting land.

Before deciding on an application within the Advisory Area (Both Inner and Outer Planning Advisory Areas), the Responsible Authority must seek the views of Work Safe Victoria.

8.0 Application Requirements

An application must be accompanied by the following (as necessary);

- A detailed Urban Context analysis of the features of the land and its strategic planning context within metropolitan Melbourne and Williamstown.
- A Site Analysis report which demonstrates how the proposed buildings or works achieve each design objective or Built Form outcomes of the Table to this schedule.
- Plan(s) which provide;
 - Details of heights, setbacks, off-sets between buildings, pedestrian entry points and frontages of all buildings;
 - Areas of new public realm and streets;
 - Visual analysis of the proposed development;

- Shadow diagrams between 9am and 3pm 22 September;
 - Indicative staging plan; and
 - Evidence that parking is provided within the site boundary or adjacent road of each site.
- Specifications for development within the WorkSafe Planning Outer Advisory Area which detail measures to ensure the buildings can withstand overpressures of up to 6kPa.
 - A Wind Report detailing potential impacts of the development on the public realm.
 - An assessment of the impact of the development on the Cultural Heritage Significance including an archaeology assessment to determine the potential for archaeological significance of the site and surrounds.
 - A report identifying the Environmentally Sustainable Design (ESD) features of the development.
 - A Landscape Concept Plan showing public and private realm landscaping.
 - An Infrastructure Services Report (including utilities, road and community services) identifying the improvements which are required to be made to the site and surrounding area.
 - A Construction Management Plan.
 - An Acoustic Report.
 - An Emergency Evacuation Plan prepared in consultation with Council, Mobil, BAE, the Port of Melbourne Corporation and relevant emergency services agencies.
 - Traffic Impact Assessment Report.

9.0 Decision guidelines

Before deciding on an application the responsible authority must consider, as appropriate:

- Whether development is consistent with the design objectives and outcomes for each precinct as identified in the Table to this schedule.
- Whether the development displays excellence in architecture, design and built form.
- Whether the design enhances the public realm, maintains a human scale at the street edge and allows sunlight penetration to public and private spaces.
- Whether car parking areas are screened from view.
- The need for contributions to infrastructure improvements arising from the development.
- Whether the development addresses the heritage objectives and policies of Clause 22.01.
- Whether the development incorporates appropriate noise attenuation measures.
- Whether the buildings located within the WorkSafe Outer Planning Advisory Area can withstand overpressures of up to 6kPa.
- The views of the parties listed in the 'Notice and review provisions of this Schedule'.

Table to Schedule

| MAP AREA | INDICATIVE BUILDING HEIGHT | BUILT FORM OUTCOMES |
|--------------------------------------|-----------------------------------|--|
| LOCAL STREETSAPES (Orange) | 10 metres | <p>Development which responds to the predominant streetscape and built form character of Cecil and Ann Streets.</p> <p>A two storey street edge (up to 7 metres) on Cecil Street with recessed upper levels.</p> <p>A three storey street edge (10 metres) on Ann Street.</p> <p>Dwellings to have a frontage to Cecil and Ann Streets.</p> <p>Vehicle access from the rear of the site consistent with the existing dwellings on Cecil and Ann Streets.</p> |
| AITKEN CORRIDOR (Pink) | 13 metres | <p>Development which provides an appropriate scale to the street edge along Aitken Street.</p> <p>A three storey street edge (up to 10 metres) with recessed upper levels setback 5 metres from the street.</p> <p>Development which provides an appropriate interface and sufficient setbacks to the existing residential area to the south.</p> |
| URBAN EDGES (Purple) | 13 metres | <p>A hard urban edge to Nelson Place and Kanowna Street.</p> <p>A predominant building height of 10 metres up to a maximum of 13 metres to allow for varying façade and roof forms.</p> <p>Appropriate regard to the heritage characteristics of the former hotel on the corner of Kanowna and Aitken Streets.</p> <p>Dwellings which have a direct street address with pedestrian access at street level.</p> <p>Lower density residential development within the Planning Outer Advisory Area.</p> <p>Buildings in the WorkSafe Outer Planning Advisory Area that can withstand overpressures of up to 6kPa.</p> |
| NELSON/ANN CORNER (Blue) | 19 metres | <p>A prominent building which provides emphasis to the corner of Nelson Place and Ann Street.</p> <p>A building which incorporates innovative façade articulation and limited sheer walls.</p> |
| CENTRAL (Green) | 25 metres | <p>Higher development relative to the adjoining properties which does not dominate the scale and setting of the street and foreshore.</p> <p>Development which provides an appropriate scale to the street edge along Aitken Street.</p> <p>Buildings which are located outside the WorkSafe Planning Advisory Areas.</p> <p>Buildings which are oriented to the north to take advantage of the views and vistas of the Port Phillip Bay and City skyline.</p> |
| STREET SYSTEM | N/A | <p>A new east-west road between Ann and Kanowna Street located approximately 35 metres south of Nelson Place.</p> <p>A new north-south road located approximately 35 metres east of Ann Street.</p> <p>A new north-south road which is an extension to the north of</p> |

| MAP AREA | INDICATIVE BUILDING HEIGHT | BUILT FORM OUTCOMES |
|---|----------------------------|--|
| | | <p>Windsor Terrace up to Nelson Place.</p> <p>Streets and access ways which are landscaped and provide through public access.</p> <p>A landscaped edge along Nelson Place to complement the established boulevard trees on the north side of Nelson Place.</p> <p>Public landscaping along the east side of Ann Street to complement the existing landscaping on the west side of Ann Street.</p> <p>Pedestrian footpaths and street landscaping on both side of Aitken Street.</p> <p>Central vehicle access points with limited individual access points directly from the street.</p> |
| PEDESTRIAN ACTIVITY/ MEETING POINT | N/A | <p>Formalised pedestrian meeting points though the provision of street furniture, public art, weather protection and public realm improvements.</p> <p>Development which provides active frontage and commercial opportunity to corners.</p> |