

**Amendment C395 to the Greater Geelong Planning Scheme**  
EXPERT WITNESS STATEMENT – MARK WOODLAND  
6<sup>TH</sup> NOVEMBER 2019

Project number	2486
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Version	01 191106

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## 1. Introduction

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1. I have been instructed in this matter by Harwood Andrews who act for the City of Greater Geelong in relation to Amendment C395 to the Greater Geelong Planning Scheme.
2. I have been asked to prepare an expert report setting out my opinion in relation to the following questions relating to the Amendment:
  - The role of the framework plan in guiding future use and development in the Northern and Western Geelong Growth Areas Framework Plan – March 2019 (the Framework Plan);
  - The planning merits of the use and development outcomes described in the Framework Plan;
  - The planning scheme amendment implementing the Framework Plan;
  - Issues raised in submissions relating to:
    - particular land use and development outcomes contained in the Framework Plan; and
    - the proposed future precinct structure plan boundaries and sequencing; and
  - Any issues that I consider should be addressed by way of post-exhibition change
3. In preparing my evidence I have reviewed and had regard to the following documents:
  - Amendment C395 documentation
  - City of Greater Geelong's Settlement Strategy (2018)
  - Northern and Western Geelong Growth Areas Framework Plan (2019)
  - Background studies that informed the Growth Area Framework Plans
  - G21 Regional Strategy
  - The Greater Geelong Planning Scheme
  - Precinct Structure Planning Guidelines (GAA, 2009)
  - Ministerial Direction No 12 ('Urban Growth Areas')
  - Melbourne Growth Corridor Plans (GAA, 20012)
  - Planning Practice Note N0 13 ('Incorporated and Reference Documents')
  - Planning Panel report in respect to Amendment C67 to the Macedon Ranges Planning Scheme
  - Mt Atkinson and Tarneit Plains Precinct Structure Plan and associated planning scheme provisions

## **2. Expert Witness Statement.**

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### **The name and address of the expert.**

Mark Woodland of 3 Prentice Street, Brunswick VIC 3056.

### **The expert's qualification and experience.**

Mark Woodland holds a Bachelor of Planning and Design from the University of Melbourne. He is a member of the Victorian Planning and Environment Law Association and the Property Council of Australia.

A Curriculum Vitae is included Appendix 1.

### **The expert's area of expertise to make this report.**

Mark has a broad range of experience in planning and development matters with a sound understanding of statutory planning provisions and significant experience in strategic planning and policy development enabling him to comment on a wide range of planning and development issues.

### **Other significant contributors to the report.**

Not applicable.

### **Instructions that define the scope of the report**

Mark Woodland has been instructed by Harwood Andrews who act for the City of Greater Geelong.

### **The identity of any person who carried out tests or experiments upon which the expert has relied on and the qualifications of that report.**

Not applicable.

### **The facts and matters and all assumptions upon which the report proceeds.**

Mark Woodland relies upon the reports and documents listed in Section 1.0 of this report.

### **Documents and other materials the expert has been instructed to consider or take into account in preparing his report, and the literature of other material used in making the report.**

Mark Woodland has reviewed and taken into account the reports and documents listed in Section 1.0 of this report.

### **A summary of the opinion or opinions of the expert witness**

A summary of Mark Woodland's opinions is provided for within section 3.0 of this report.

**Any opinions that are not fully researched for any reason**

Not applicable.

**Questions falling out of the expert's expertise and completeness of the report.**

Mark Woodland has not been asked to make comment on any matters outside of his area of expertise. This report is a complete statement of evidence.

**Expert Declaration**

I have made all the inquiries that I believe are necessary and desirable to prepare and present expert evidence in this matter and no matters of significance which I regard as relevant have to my knowledge been withheld from the Panel.



Mark Woodland  
6<sup>th</sup> November 2019

### 3. Summary of Evidence

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4. My evidence focused on the Northern and Western Growth Area Framework Plan ('Framework Plans') aspects of Amendment C395 to the Greater Geelong Planning Scheme.
5. Over 110,000 people are expected to ultimately live in these growth areas and so it is essential that there is robust spatial and policy framework in place to guide the more detailed infrastructure and precinct planning that will occur in future years.
6. I consider that the Framework Plans are high quality strategic planning documents that provide appropriate guidance on the future use and development in each growth area.
7. I have made a number of suggestions about how the Framework Plans and associated planning provisions might be improved, however my overall view is that I support the adoption and implementation of these plans via Amendment C395 to the Greater Geelong Planning Scheme.
8. My opinions in relation to the specific planning matters set out in paragraph 2 of this statement are as follows:

#### **3.1. The role of the framework plan in guiding future use and development in the Northern and Western Geelong Growth Areas Framework Plan – March 2019 (the Framework Plan)**

9. The primary purpose of the Framework Plans is *a.* to set an overarching strategic planning framework to guide future development in each of the two growth areas, and *b.* to inform future Precinct Structure Plan (PSP) processes.
10. State policy (clause 11.02-3S) identify what Framework Plan should address.
11. Framework Plans are not intended to an absolute prescription of the land use and development outcomes for land within growth areas.
12. There are significant differences in the level of technical information available to inform a Framework Plan as compared with a precinct structure plan. At the precinct planning stage, the Planning Authority is armed with considerably more detailed precinct-scale technical assessments with which to make decisions regarding the optimal urban structure within the given precinct.
13. It is therefore expected that changes to the layout or land use mix shown in a Framework Plan may need to be made in relation to certain issues, based in the more detailed information available to the Planning Authority at that time.
14. In my view this is both usual and appropriate, so long as the proposed changes could be described as being in general accordance with the overall spatial aspirations of the Framework Plan, and they

can give effect to the vision and planning objectives contained within the planning scheme for the location.

### **3.2. The planning merits of the use and development outcomes described in the Framework Plan**

15. The Frameworks Plan satisfies the requirements for such plans set out in State policy (clause 11.02-3S).
16. The overall use and development outcomes described in the Framework Plan have strong planning merit, and I have made a number of suggestions for potential additions or refinements to the Framework Plans, as summarised below.

#### **3.2.1. Clever and Creative Corridor**

17. Include a plan that identifies the key destinations that the C&CC is intended to link to (e.g. the Geelong CBD, and key train stations).
18. Include additional text to clarify how the land use framework along the C&CC is expected to deliver an urban density and land use mix that can sustain the level of public transport service needed to support public transport patronage in this corridor.
19. Simplify the text and diagrammatic descriptions of the land use outcomes along the C&CC within Framework Plan (pp 45-53).

#### **3.2.2. Environment**

20. Include an integrated open space plan that brings together all the various public space and walking/cycling network features into a single view.
21. *Landforms and view lines*- Include additional text and diagrams to clarify how the monocline feature is expected to form part of a wider regional open space system and/or how views to and from the monocline are intended to be retained.
22. *Landforms and viewlines*- Include additional text to identify that some of the steeper embankments along the Moorabool River may need to be set aside because of the contribution that they make to the landscape setting of the growth area.
23. *Biodiversity* - Include additional text to provide greater clarity in relation to the means by which the biodiversity linkage plan is expected to be implemented. for each corridor.
24. *Built Environment*- Clarify the wording of Actions W1.6.1 and W1.6.3.
25. *Built Environment* – Amend the description of the ‘lakeside residential’ precinct on the Framework Plan to say ‘*investigation area: potential urban - subject to assessment of site constraints.*’ and include an Action in the Framework Plan relating to this.

### **3.2.3. Neighbourhood**

26. *Neighbourhood design* - Consider amending the 20 minute neighbourhood concept to a 10-minute neighbourhood concept.
27. *Neighbourhood design* – Include additional text summarising the key land use and accessibility ingredients of a 10 minute neighbourhood.
28. *Neighbourhood design* – Include descriptions for what is meant by low, conventional, medium and high density.
29. *Social infrastructure* – Include text that explains the intended purpose of Plans 24 and 27 in directing where certain types of social infrastructure are intended to be located.
30. *Social Infrastructure* - Include text that explains the implications of the gas pipeline buffer on the location of certain types of social infrastructure (community centres, schools, sports pavilions).

### **3.2.4. Economy**

31. *Activity Centres in the Northern Growth Area* – Confirm whether locating the northernmost neighbourhood centre within the designated Gas Pipeline measurement length is acceptable or not.
32. *Activity Centres in the Western Growth Area* – Consider relocating the regional town centre further south, potentially on the north side of the waterway that runs to the north of the Hamilton Highway.
33. *Employment* - Include an additional Action to identifying opportunities for live-work spaces within the C&C Corridor (Plans 28 and 29), as well as live/workspaces, shared workspaces, smaller-scale offices, and local office/warehouses within or on the edges of town centres.

### **3.2.5. Delivery**

34. *Precinct concept plans* - Either remove these plans or include a statement of limitations in the Framework Plan explaining that these are only intended to show the potential combination of land uses and infrastructure requirements that need to be addressed at the PSP stage, and that the plans do not represent a final or preferred urban structure for the precinct.
35. *Precinct Infrastructure requirements*- Include a statement of limitations explaining that their purpose is to identify the broad infrastructure needs for each precinct, but that these will be refined as each PSP is prepared.

## **3.3. The planning scheme amendment implementing the Framework Plan.**

### **3.3.1. The role of the Framework Plan in decision making under the planning scheme**

36. I support the underlying intention of Clause 21.20.4 in seeking to ensure that land use and development proceeds generally in accordance with the Framework Plans.
37. However, it is my opinion that it is not appropriate for policies or strategies within a planning scheme to rely upon material contained within Background Documents as the basis for making decisions.
38. I therefore consider that the wording of the strategy in Clause 21.20 relating to giving effect to the Framework Plans should be amended, and I suggest the following wording:

*“Ensure land use and development gives effect to the growth area objective set out in Clause 21.20-2 and is in general accordance with the spatial framework plans set out in Clause 21.02-5.”*

39. I suggest that the following additional strategy be included in Clause 21.20-4 relating to the Background Document:

*“Land use and development should have regard to the Northern and Western Geelong Growth Areas Framework Plans.” [ie the Background documents]*

### **3.3.2. Development Sequencing**

40. I support the underlying intent of Clause 21.04 to ensure that land use and development proceeds generally in an orderly sequence. Defining a preferred development sequences in areas of growth to better coordinate infrastructure planning and funding is supported by State planning policy<sup>1</sup>.
41. I consider that that the sequencing criteria set out in actions N5.2.1 and W5.2.1 should be included within the local policies in the planning scheme, and amended to include consideration of the following factors:
- Whether the precinct will enable the staged extension of infrastructure networks in a way that minimized the real cost of infrastructure provision.
  - Whether or not a precinct subject to major constraints or uncertainties that could delay development and are of a size and with a pattern of land ownership that is likely to result in a substantial and predictable yield of housing and or industrial land.
  - Whether a precinct’s development will support thee effective and early development of public transport infrastructure, town centres and employment precincts<sup>2</sup>.
42. If the sequencing criteria were included within the planning scheme, then I do not consider it to be necessary for a specific order of PSP sequencing to be mandated by the planning scheme.

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<sup>1</sup> Clause 11.02-35

<sup>2</sup> These additional criteria have been derived from the sequencing criteria contained within the Melbourne Growth Area Framework Plans, page 35 (GAA, 2012)

### **3.3.3. The Urban Growth Zone**

43. I consider that the UGZ is the most appropriate zoning provision to apply to developable land within the growth area, given the extensive area of land contained within the Framework Plans and the long timeframes associated with its development. The Urban Growth Zone (UGZ) is now a well-established and widely used tool for facilitating urban development in growth areas across the State.
44. It is possible that the UGZ may be extended to apply to additional land within the growth area in future, but this is depended on the outcomes of the specific investigations referred to within the Framework Plan document. I consider this to be a prudent and orderly approach to the future planning of these investigation areas.

### **3.4. Issues raised in submissions relating to land use and development outcomes contained in the Framework Plan.**

#### **3.4.1. Planning Process**

45. I am satisfied that there have been sufficient opportunities for landowners to engage with council and make submissions in relation to the Framework Plans.

#### **3.4.2. Development Levies**

46. The role of the Framework Plan is not to resolve how the infrastructure required to support the proposed growth is to be funded. Guidelines are in place in relation to the use of DCPs and ICP to fund works (specific guidelines for regional ICPs are also under development). Council may wish to separately prepare an infrastructure funding/coordination strategy, to assist it in the forward planning of infrastructure delivery.

#### **3.4.3. Land Acquisitions**

47. Any land required for public infrastructure will be identified as part of future planning processes (including the preparation of PSPs or upgrades to declared road upgrades), with compensation derived from the relevant DCP/ICP or via other processes.

#### **3.4.4. Lot Yield**

48. The level of accuracy on lot yields will increase once individual precinct plans are prepared. Notwithstanding, I consider that it would be helpful for the assumptions behind the lot yields in each document to be set out in an appendix to the Framework Plans and Settlement Strategy.

### 3.4.5. Clever and Creative Corridor

49. *Reserving land for the corridor* - Whilst I acknowledge that there are a number of technical issues that need to be addressed regarding the design and function of the corridor, I support the reservation of land for the corridor as part of both the Framework Plan and future Precinct Structure Plans.
50. *Corridor alignment* - It is necessary to show an alignment in the Framework Plan because a series of related land uses are correlated to the corridor. Further technical analysis of the transport options for the corridor will occur alongside the development of precinct plans along the corridor. Opportunities will exist to refine the alignment of the C&CC as part of these future processes.
51. *Evans Road*- Evans Road is the logical existing road alignment to facilitate transport movements between the two growth areas.
52. *Removal of Corridor components and dimensions from Framework Plan* - I do not support removing the corridor components and dimensions from the Framework Plan. It is necessary to show both the corridor components and the expected corridor dimensions in the Framework Plan in order to provide sufficient clarity in relation to the intended future function of the corridor.
53. *Detailed design suggestions for the Corridor* - Further technical analysis of the transport options for the corridor will occur alongside the development of precinct plans along the corridor. Opportunities will exist to make changes to the conceptual design of the C&CC as part of these future processes.
54. *Impact of the Corridor on existing business operations* - The potential impacts of the C&CC on existing business operations are matters that can be addressed as part of future precinct planning processes.
55. *Market demand for higher density housing along the Corridor* - If the C&CC is to be adopted then so too must the medium density requirements referred to in Actions N2.17 and W2.16. Each is dependent upon the other, and there is a need to be realistic about these interdependencies. For these reasons I do not support removing or reducing the medium density requirements referred to in Actions N2.17 and W2.16.

### 3.4.6. Activity Centres

56. *Relocate the NGGA sub-regional centre to the northeast*: - I do not support moving the location of this centre.
57. *Replace the north-eastern NGGA neighbourhood activity centre with two centres*: - I can see some planning merit in the suggested modification. However, unless the question of the economic viability of creating four versus three neighbourhood centres in this growth corridor can be resolved as part of the current Amendment process, then I would suggest that the merit or otherwise of this suggestion can be further tested during the course of preparing future PSPs in this growth area.

58. *Change NGGA neighbourhood activity centre retail floor space range in Framework Plan:* - This is a matter that is outside my professional expertise.
59. *Relocate the WGGA sub-regional centre north to abut Midland Highway:* - I am not convinced that there is a strong town planning rationale for locating the centre in the revised location as compared to the location shown on the exhibited Framework Plan.
60. *Include one or both activity centres shown on the boundary of the Creamery Road and Batesford North precincts in the Creamery Road PSP:* - The proposed locations are indicative and will be determined tested during the course of preparing future PSPs in this growth area.
61. *Shift focus of WGGA neighbourhood activity centre to the north-west, adjacent to future rail station:*  
- The optimal relationship between the activity centre, the C&CC and the proposed future railway station can be determined during preparing future PSPs in this growth area.

#### **3.4.7. Land Use Zoning requests**

62. The primary purpose of Amendment C395 is to establish a policy framework in the Greater Geelong Planning Scheme for the northern and western growth areas.
63. The rezoning of land via this Amendment is only proposed to the extent that it seeks to set aside future urban land in the Urban Growth Zone. This is to ensure that the land designated for future urban purposes is planned in an order manner (via PSPs) and also to ensure that this land is not prejudiced by uses or developments in the intervening period. Other opportunities to rezone land as a result of future investigations in relation to various issues raised by submitters can be further considered at the time that a PSP is prepared for these sites.

#### **3.4.8. Surrounding land uses**

64. *The Lara Energetic Materials Manufacturing Plant (LEMMP):* - I consider that it is reasonable to amend Clause 21.20 to reference the need to protect existing buffers of the LEMMP and to modify Plan 23 to remove any suggestion that medium density housing might be supported within the catchment of the C&CC. I agree with Council that it is premature to apply an ESO to the 1km buffer as part of Amendment C395.
65. *Impacts of the growth areas on adjacent farming operations:* - I do not support the submitters request for an area of rural living to be designated on the northern and western boundaries of the NGGA.
66. *Encroachment of the growth areas on the Anakie Extractive Industry Interest Area (EIIA):* I do not see any specific need to nominate non-urban break on the Framework Plan of Geelong Growth Strategy.

### **3.4.9. Utilities – gas pipelines**

67. I understand the APA submission to mean that measurement length referred to Plan 12 and Action 1.6.8. of the Framework Plan could be revised from 570m to 350m. The question of whether or not locating the town centre, the C&CC and pavilions associated with sporting reserved could potentially be located within the 350m measurement length should also be clarified in the Framework Plan so to as to avoid any conflict in relation to this issue at the PSP stage.

### **3.4.10. Utilities Electricity transmission easements**

68. I support the intent of this submission. There are precedents for land within transmission line easements being used for activities such as linear open space, hardstand areas associated with industry, etc. The question of what zone to apply to land within the powerline easements could either be resolved as part of current amendment process or during the preparation and approval of PSPs for the relevant land.

## **3.5. Issues raised in submissions relating to the proposed future precinct structure plan boundaries and sequencing**

### **3.5.1. Precinct Boundaries**

69. There are no specific State government policies or guidelines on selecting the size of shape of a precinct that is intended to be subject to the preparation of precinct structure plans (PSPs).
70. The size and shape of any given PSP will vary depending on the local circumstances and needs. However, there are several State planning policies that should inform the nominated size and shape of a PSP. In addition, the strategic intent of the Framework Plan should also inform the size and shape of PSPs.
71. Based on my review of relevant State policies and the Framework Plans, I consider that the size and shape of PSPs within each growth area should be informed by the following criteria where practicable:
- Be able to meaningfully contribute towards meeting the municipality's overall land supply needs.
  - Be of a size and nature that can be prepared in an efficient and timely manner.
  - Be able to deliver the necessary infrastructure to support growth in a coordinated and cost-effective manner.
  - Enable the creation of relatively self-contained neighbourhoods that can satisfy State and local policy aspirations.
  - Take account of the natural and physical characteristics that can define neighbourhood identity or define its edges.

72. I have undertaken an assessment of the proposed precinct boundaries shown in the Framework Plans against the above criteria. It is my view that the size and shape of each PSP proposed in the Framework Plans area appropriate having regard to these criteria set out above.
73. I have not attempted to evaluate the proposed precincts in relation to the infrastructure criteria as this is a matter that falls outside of my expertise. Therefore, my observations in relation to the PSP boundaries are subject to further consideration of infrastructure delivery criteria.
74. I have reviewed submissions that have requested changes to the PSP boundaries, and I do not consider that the alternative approaches proposed in these submissions have sufficient merit to warrant making changes to the boundaries shown in the Framework Plans.

### **3.6. Development Sequencing**

75. I support the underlying intent of Clauses 21.04 and 21.06 to ensure that land use and development proceeds in an orderly and coordinated sequence. Defining a preferred development sequences in growth area to better coordinate infrastructure planning and funding is explicitly supported by State planning policy. I therefore do not support amending the wording of Clause 21.04 in relation to the need to limit the number of PSPs that can be prepared simultaneously.
76. Based on my current knowledge of the growth areas (and noting the need to confirm that infrastructure can be delivered in a coordinated and cost-effective manner in each precinct), I support the sequencing proposed in the Framework Plans.

#### **3.6.1. Issues that I consider should be addressed by way of post-exhibition change**

77. I have set out the issues that I consider should be addressed by way of post-exhibition change above.

## 4. Planning Scheme Amendment C95

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78. Planning Scheme Amendment C395 proposes a series of updates to the Greater Geelong Planning Scheme to give effect to the City of Greater Geelong's Settlement Strategy (2018) and the Northern and Western Geelong Growth Areas Framework Plan (2019).
79. The policy components of the Amendment affect all land in the municipality with specific policy affecting the Northern and Western Geelong Growth Areas. The rezoning affects selected properties in the proposed Northern and Western Geelong Growth Areas as shown on the exhibited planning scheme maps.
80. The amendment includes policy changes to the Municipal Strategic Statement (MSS) and rezones land in the Northern and Western Geelong Growth Areas to the Urban Growth Zone.
81. Specifically, the Amendment seeks to:
- Amend Clause 21.03 Objectives - Strategies – Implementation to include reference to 21.18 Corio Norlane and 21.20 Northern and Western Geelong Growth Areas.
  - Replace Clause 21.04 Municipal Framework Plan with a new Clause 21.04 to implement the Settlement Strategy through a new Municipal Framework Plan.
  - Replace Clause 21.06 Settlement and Housing with a new clause including objectives, strategies and references to implement the Settlement Strategy.
  - Amend Clause 21.08 Development and Community Infrastructure to update strategies on Transport and Development Contributions to implement the Settlement Strategy.
  - Amend Clause 21.11 Armstrong Creek Urban Growth Area to reflect the role of the Northern and Western Geelong Growth Areas.
  - Amend Clause 21.14 The Bellarine Peninsula to update objectives, strategies, further work and references to implement the Settlement Strategy.
  - Amend Clause 21.16 Anakie to implement the Settlement Strategy by amending objectives and strategies, deleting reference to the *Anakie Structure Plan 1996* and replacing the map.
  - Insert a new Clause 21.20 Northern and Western Geelong Growth Areas including new objectives, strategies, references and plans to implement the Northern and Western Geelong Growth Areas Framework Plan.
  - Replace the Schedule to Clause 72.08 Background Documents with a new Schedule that includes the City of Greater Geelong's *Settlement Strategy (2018)* and *Northern and Western Geelong Growth Areas Framework Plan (2019)*.
  - Rezone areas of land in the Northern and Western Geelong Growth Areas from Rural Living Zone, Farming Zone, Public Park and Recreation Zone and Industrial 1 Zone to Urban Growth Zone.

## 5. State and Regional Planning Policy

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82. A significant number of the State and Regional policies contained within the Planning Policy Framework (PPF) have a direct or indirect bearing on the preparation of framework plans for the Northern and Western Geelong growth areas. These include policies relating to the following issues:

- Settlement
- Environment and landscape
- Environmental risk and amenity
- Natural resource management
- Built environment and heritage
- Housing
- Economic development
- Transport
- Infrastructure

83. The following policies provide specific guidance on planning for Geelong's northern and western growth areas:

### 5.1. Settlement

84. State policy seeks to focus investment and growth in major regional cities, including Geelong<sup>3</sup>.

85. It requires planning to consider the G21 Regional Growth Plan (Geelong Region Alliance, 2013).

86. State policy support the role of Central Geelong as a major regional city and as Victoria's second city<sup>4</sup>. The Geelong G21 Regional Growth Plan is incorporated into State policy, and this plan identifies urban development investigation areas in north and west Geelong.

### 5.2. Supply of Urban Land

87. State policy seek to ensure that a sufficient supply of land is available for residential, commercial, retail, industrial, recreational, institutional and other community uses<sup>5</sup>.

88. Various strategies are identified to ensure that this objective is achieved, including the following:

'Plan to accommodate projected population growth over at least a 15-year period and provide clear direction on locations where growth should occur.'

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<sup>3</sup> Clause 11.01-1S

<sup>4</sup> Clause 11.01-1R

<sup>5</sup> Clause 11.02-1S

### 5.3. Structure planning

89. State policy seeks to facilitate the orderly development of new urban areas via the preparation of comprehensive plans for new areas which offer high-quality, frequent and safe local and regional public transport and a range of local activities for living, working and recreation<sup>6</sup>.
90. It supports the preparation of a hierarchy of structure plans or precinct structure plans that:
- Take into account the strategic and physical context of the location.
  - Provide the broad planning framework for an area as well as the more detailed planning requirements for neighbourhoods and precincts, where appropriate.
  - Provide for the development of sustainable and liveable urban areas in an integrated manner.
  - Assist the development of walkable neighbourhoods. Facilitate the logical and efficient provision of infrastructure.
  - Facilitate the use of existing infrastructure and services.

### 5.4. Sequencing of development

91. State policy seeks to manage the sequence of development in areas of growth so that services are available from early in the life of new communities<sup>7</sup>.
92. The following strategies are identified to achieve this objective:
- Define preferred development sequences in areas of growth to better coordinate infrastructure planning and funding.
  - Ensure that new land is released in areas of growth in a timely fashion to facilitate coordinated and cost-efficient provision of local and regional infrastructure.
  - Require new development to make a financial contribution to the provision of infrastructure such as community facilities, public transport and roads.
  - Improve the coordination and timing of infrastructure and service delivery in areas of growth.
  - Support opportunities to co-locate facilities.
  - Ensure that planning for water supply, sewerage and drainage works receives high priority in early planning for areas of growth.

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<sup>6</sup> Clause 11.02-2S

<sup>7</sup> Clause 11.02-3S

## 5.5. Growth Areas

93. State policy seeks to locate urban growth close to transport corridors and services and provide efficient and effective infrastructure to create sustainability benefits while protecting primary production, major sources of raw materials and valued environmental areas.
94. The following strategies are identified to achieve this objective:
- Concentrate urban expansion into growth areas that are served by high-capacity public transport.
  - Implement the strategic directions in the Growth Area Framework Plans. Encourage average overall residential densities in the growth areas of a minimum of 15 dwellings per net developable hectare, and over time, seek an overall increase in residential densities to more than 20 dwellings per net developable hectare.
  - Deliver timely and adequate provision of public transport and local and regional infrastructure and services, in line with a preferred sequence of land release.
  - Provide for industrial or other more regional employment generators.
  - Create a network of mixed-use activity centres that are high quality, well designed and create a sense of place.
  - Provide a diversity of housing type and distribution. Retain unique characteristics of established areas impacted by growth.
  - Protect and manage natural resources and areas of heritage, cultural and environmental significance.
  - Create well planned, easy to maintain and safe streets and neighbourhoods that reduce opportunities for crime, improve perceptions of safety and increase levels of community participation.
  - Develop Growth Area Framework Plans.
  - Develop precinct structure plans consistent with the Precinct Structure Planning Guidelines (Growth Areas Authority, 2009) approved by the Minister for Planning

## 6. The Role of Growth Area Framework Plans

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95. I have been asked to outline my opinion on the role of the Framework Plan in guiding future land use and development in the Northern and Western Geelong growth areas.
96. State planning policy supports the preparation of a hierarchy of strategic planning documents as means to giving effect to wider planning policy outcomes (including implementing the outcomes envisaged in the G21 Regional Growth Plan).
97. The two principle planning tools in this regard are Growth Area Framework Plans (Framework Plans) and Precinct Structure Plans (as specified in clause 11.02-3S).
98. The Framework Plans are a strategic planning tool to provide overarching spatial directions within which more detailed PSPs are to be prepared. Their primary purpose is to guide the future planning and delivery of infrastructure and urban development (via Precinct Structure Plans and other types of infrastructure delivery programs).
99. Ministerial Direction No 12 (Growth Areas) states that when a Planning authority seeking to rezone land to the Urban Growth Zone or to introduce a Precinct Structure Plan (PSP), it must demonstrate how the amendment implements any Growth Area Framework Plan applying to the land.
100. Framework Plans are not intended to an absolute prescription of the land use and development outcomes for all of the land that they apply to.
101. State policy describes the outcomes that growth area framework plans should achieve, as follows:
- Provide for industrial or other more regional employment generators.
  - Create a network of mixed-use activity centres that are high quality, well designed and create a sense of place.
  - Provide a diversity of housing type and distribution.
  - Retain unique characteristics of established areas impacted by growth.
  - Protect and manage natural resources and areas of heritage, cultural and environmental significance.
  - Create well planned, easy to maintain and safe streets and neighbourhoods that reduce opportunities for crime, improve perceptions of safety and increase levels of community participation.
102. State policy specifies that Framework Plans should:
- Include objectives for each growth area.
  - Identify the long-term pattern of urban growth.
  - Identify the location of broad urban development types, for example activity centre, residential, employment, freight centres and mixed-use employment.

- Identify the boundaries of individual communities, landscape values and, as appropriate, the need for discrete urban breaks and how land uses in these breaks will be managed.
- Identify transport networks and options for investigation, such as future railway lines and stations, freight activity centres, freeways and arterial roads.
- Identify the location of open space to be retained for recreation, and/or biodiversity protection and/or flood risk reduction purposes guided and directed by regional biodiversity conservation strategies.
- Show significant waterways as opportunities for creating linear trails, along with areas required to be retained for biodiversity protection and/or flood risk reduction purposes.
- Identify appropriate uses for constrained areas, including quarry buffers.<sup>8</sup>

103. PSPs contain a more detailed spatial land use and development framework for individual precincts than Framework Plans. The relationship between Framework Plans and PSPs is described in the Melbourne Growth Corridor Plans as follows:

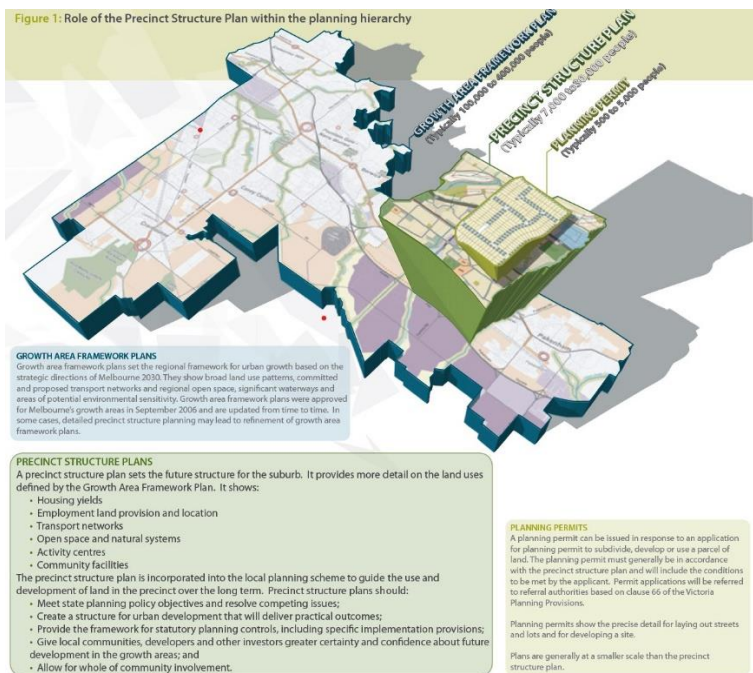
*“Before development can commence, detailed planning for each precinct must occur in the form of individual Precinct Structure Plans (PSPs), which must be ‘generally in accordance’ with the Growth Corridor Plans ... Unlike the broad strategic view adopted by the Growth Corridor Plans, PSPs are much more detailed planning documents that guide development in a neighbourhood or series of neighbourhoods ...PSPs fill in the detail of the broader picture presented by the Growth Corridor Plans. They set the pattern for neighbourhood development and ensure that individual developments, which may occur over a number of years, effectively fit together to create an attractive, convenient and sustainable local community.”<sup>9</sup>*

104. The relationship between the Framework Plan, PSP and planning permits is illustrated in the diagram from the PSP Guidelines (Part One), overleaf.

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<sup>8</sup> clause 11.02-3S

<sup>9</sup> Melbourne Growth Corridor Plans, page 7 (GAA, 2012)



**Fig 1** Relationship between the Framework Plan, PSP and planning permit.

105. PSPs will also contain a series of planning Requirements and Guidelines which are used (together with the provisions in the Urban Growth Zone schedule, Clause 56 and other parts of the planning scheme) in the assessment of specific development proposals to use, develop and subdivide land for urban purposes.
106. State policy goes on to specify that Planning Authorities should develop PSPs that are consistent with the Precinct Structure Planning Guidelines (Growth Areas Authority, 2009). These Guidelines provide direction on the relevant design standards and the level of detail that a PSP should address.
107. The PSP Guidelines note that in some cases, detailed precinct structure planning may lead to refinement of Framework Plans<sup>10</sup>. This is because the level of detail about any given precinct is not as comprehensive at the Framework Plan stage as it is as the PSP stage. The preparation of a PSP will involve completion of site-specific technical studies that may reveal the need for alternative approaches to be taken to various issues such as the design of waterways and transport networks, placement of town centres, open space networks, etc.

<sup>10</sup> Refer to text in Figure 1 above.

108. Whether any changes to the layout shown in a Framework Plan that are proposed at the PSP stage are acceptable is generally resolved by addressing the following questions:
- Whether the changes could be described as being in general accordance with the Framework Plan, and;
  - Whether the change could be said to still give effect to the vision and objectives contained within the Framework Plans.
109. In summary, the Framework Plans are a strategic planning tool to provide an overarching framework within which more detailed PSPs are prepared. Their primary purposes are to set an overarching strategic planning framework to guide future development in each of the two growth areas, and to inform future PSP processes.

## 7. The Strategic Planning Merit of The Use and Development Outcomes in The Framework Plans

110. I have been asked to outline my opinion on the strategic planning merit of the use and development outcomes contained within the Framework Plan.

111. I have reviewed the Frameworks Plans against the requirements for such documents set out in State policy (at clause 11.02-3S. The following table is a broad summary of this review.

Policy Requirement:	Satisfied?	Comment:
Include objectives for each growth area.	YES	Each Framework Plan includes a statement of vision and a set of urban development objectives.
Identify the long-term pattern of urban growth.	YES	Each Framework Plan identifies in detail what the anticipated long-term pattern of urban growth is expected to be.
Identify the location of broad urban development types, for example activity centre, residential, employment, freight centres and mixed-use employment.	YES	Each Framework Plan identifies preferred locations for a clearly defined set of urban development activities. These are supported by thematic maps and text which set out the spatial logic for each land use category.
Identify the boundaries of individual communities, landscape values and, as appropriate, the need for discrete urban breaks and how land uses in these breaks will be managed.	YES	The Framework Plans identifies the existing Batesford community and provide a framework to ensure that it will retain a separate rural township identity over time. It also recognises notable landscape values such as the Moorabool river and floodplain, Batesford Quarry and the Monocline. The Framework Plan also propose the creation of a definable urban break between the north and west growth areas, together with strategies for managing the interface between rural and urban areas.
Identify transport networks and options for investigation, such as future railway lines and stations, freight activity centres, freeways and arterial roads.	YES	The Framework Plan provides for road, public transport, walking and cycling networks, and they incorporate an innovative integrated transport network in the form of the 'clever and creative corridor'. The proposed networks have been derived following a technical analysis of the likely access and movement needs of the community in each growth area, and their inter-relationship with the existing infrastructure in Geelong (including access to existing train stations, town centres, etc.).
Identify the location of open space to be retained for recreation, and/or biodiversity protection and/or flood risk reduction purposes guided and directed by regional biodiversity conservation strategies.	YES – IN PART	The Framework Plan Identifies land to be set aside for waterways (including the lake at the Batesford quarry), floodplains and constructed wetlands.  It also identifies potential locations for active recreation reserves. It also identifies some known areas of native vegetation as well as potential locations for the establishment of pedestrian trail, biodiversity linkages and retention of landscape features. However, the Framework Plan does not define in specific terms the areas that are to be set aside for these purposes, leaving

		the demarcation of these matters to the more detailed PSP planning phase. The Framework Plan has not been informed by detailed assessments of biodiversity values or by any overarching regional biodiversity conservation strategies. Refer section 7.2.3 for further discussion on this point.
Show significant waterways as opportunities for creating linear trails, along with areas required to be retained for biodiversity protection and/or flood risk reduction purposes.	YES – IN PART	The Framework Plan shows significant waterways as opportunities for creating linear trails, along with areas required to be retained for flood risk reduction purposes.  It identifies some known areas of native vegetation but does not clearly define whether or not these areas will need to be retained – this is a matter that is expected to be addressed as part of an overarching biodiversity conservation strategy to be prepared prior to the commencement of any PSPs in the growth areas. Refer section 7.2.3 for further discussion on this point
Identify appropriate uses for constrained areas, including quarry buffers.	YES	The Framework Plan identifies areas that are constrained by slope, flooding, heritage, adjacency to industry etc., and it identifies suitable uses for each location.

112. The discussion below comments in greater detail on what I consider to be the planning merits of each of the specific elements of the Framework Plans.
113. I have identified a number of suggested changes to the Framework Plan in order to improve its clarity and usefulness in guiding use and development outcomes in the future.
114. Many of these suggested changes relate to matters of detail contained within the Framework Plan documents. I have previously recommended that the Future Urban Structure be included within the local policy document, and that decision makers must ensure that development proposals are in general accordance with it, and that the main Framework Plan document become a 'Background Document' and that the Planning Scheme require that decision makers have regard to it.
115. In the event that the provisions of the planning scheme do ultimately rely upon the full Framework Plan document to inform decision making then it is my view that all of changes that I have suggested be made as part of the current amendment.
116. In the event that the main Framework Plan becomes a Background Document then I consider that changes that I have suggested which would alter the planning provisions (including the Future Urban Structure) should be made as part of the current Amendment, and it would be perhaps less critical that the suggested changes to the main Framework Plan be made now.
117. However I consider that if the planning provisions do require decision makers to have regard to this as a Background document then I consider that it would be better for the changes to be made to the document now.

### **7.1. The 'Clever and Creative Corridor' concept**

118. The concept of the Clever and Creative Corridor ('C&CC') is innovative and if done well it could make a major contribution towards the vision for the Corridor described in the Framework Plan.
119. The C&CC proposes a new approach to aligning urban development to sustainable transport modes in a greenfield setting. It is an important innovation that warrants strong policy support in the Framework Plan, as well as sufficient definition of the concept itself so that the desired integration outcomes can be properly understood and accommodated in future precinct plans and development proposals.
120. The primary function of the C&CC is to provide for the creation of sustainable transport linkages between neighbourhoods and between the growth areas and external destinations (including the Geelong CBD and Melbourne).
121. The C&CC has been designed to link up activity centres across the growth area. Travel by private car will largely occur on a separate network of arterial and connector roads, and the transport modelling prepared by GTA demonstrates that the overall network design will result in the C&CC carrying low levels of private traffic on it.
122. The C&CC concept requires a 14m wide median reserve to accommodate dedicated public transport services. Whilst the exact public transport mode is yet to be resolved, I consider that setting aside this reservation along the C&CC spine will provide flexibility for the future delivery of a range of potential walking, cycling and public transport solutions within it.
123. There are several matters that could be clarified in the Framework Plan in relation to the future role and function of the C&CC, as follows:

#### **7.1.1. Identifying key external destinations and linkages**

124. The transport studies that have informed the Framework Plan identify several possible public transport solutions for the growth areas, including:
- New light or heavy rail connections to central Geelong on the Western Rail Corridor
  - A Bus rapid transit link (BRT) to central Geelong via existing east-west routes
  - A BRT link to central Geelong via a new dedicated route at Church Street
  - An orbital BRT route connecting the two corridors to the Melbourne rail line at Lara
  - Local bus services
125. There are several critical transport linkages to the proposed C&CC corridor that need to be preserved in a form for these options to be realised. It would be worthwhile for this section of the Framework Plan to show the key destinations that the C&CC might link to (e.g. the Geelong CBD,

and key train stations) and also more explicitly identify the various options and the linkages that they depend on here as well<sup>11</sup>.

### **7.1.2. The density implications of the C&CC**

126. The GTA traffic modelling indicates that current existing bus travel times in Geelong compare very unfavourably to private vehicle travel times<sup>12</sup>, and that a 'business as usual' future in the new growth areas would realise a public transport mode share of just 1.7% in the growth area at 2051<sup>13</sup>.
127. This underscores the criticality of ensuring that public transport services in the corridor provide an equal if not better level of service than private vehicle travel.
128. Aecom have suggested that a BRT-type service would need to carry approximately 1000 passengers per hour in critical peak times in order to reduce the need for road widening, and that this would translate into a service every 7-9 minutes in peak times<sup>14</sup>.
129. The residential and other land use densities within the walking/cycling catchments of the C&CC would need to be sufficiently high to sustain this level of trip generation. The risk is that if enough patronage levels are not supported, then the corridor will not be able to sustain BRT levels of services, and residents would default to private car travel over the alternative standard local bus service offering.
130. I suggest that the Framework Plan acknowledge these challenges, and make more explicit how the land use framework will deliver an urban density and land use mix that can genuinely sustain the level of public transport service that is needed to substantially drive up public transport patronage in this corridor.

### **7.1.3. Other land use implications of the C&CC**

131. The Aecom report clarifies that the C&CC would principally be a linear corridor, with the two loops at either end forming part of a secondary public transport corridor.
132. The primary corridor would be a two-way linear link between the growth areas and destinations outside the growth area, and it would presumably be serviced by a higher capacity and/or more frequent public transport services. So, the larger town centres and higher density residential uses would therefore benefit from being along the primary loop. The

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<sup>11</sup> I note that many of these are shown in the Movement chapter but this is circa 150 pages further into the framework plan, at pp 200-206

<sup>12</sup>GTA (June 2019), page 70

<sup>13</sup>Ibid., page 32

<sup>14</sup> Aecom (September 2017), page 32

133. designation of the primary loop alignment will ultimately inform (and/or be informed by) decisions relating to the scale and density of land use within the corridor. This could also be made clearer in the Framework Plan.
134. The description of the desired land use outcomes along the C&CC within Framework Plan (pp 45-53) could also be simplified and more clearly articulate the differential land use outcomes that are expected along the length of the corridor. The diagrams contained in the Framework Plan could be simplified for instance, and a spatial sketch could articulate what land use outcomes are expected (for (instance) within 400m of a town centre versus the likely land use outcomes in the intervening areas.

#### **7.1.4. The interim versus ultimate C&CC**

135. The GTA transport modelling identifies that in 2051 the C&CC routes will carry modest traffic volumes, which will mean that they can readily prioritise public transport, walking and cycling movements.
136. However, in the interim period (which may be for many decades) the Framework Plan contemplates that the public transport services will run on a single lane 'connector road' network. This may result in bus travel time delays which will in turn mitigate against achieving the mode shift articulated in the plan.
137. The Framework Plan should articulate how public transport services could be provided within this interim corridor to offer a level of service and travel time that is competitive with private car travel over this interim period.

#### **7.2. Environment**

138. This element of the Framework Plan contains a spatial representation of the relevant environmental feature/outcomes for the growth area (each of which has been based on corridor-scale background technical research) and actions for the future management of the environmental feature/outcome.
139. The Vision describes how the environmental features of each growth area are expected provide a high-quality natural setting for future urban development. The various detailed spatial elements contained throughout the Framework Plan (conservation reserves, waterways, active open space, linear trails, etc.) will individually contribute towards the creation of what could become an integrated open space network.
140. I consider that all of the ingredients needed for the creation of an integrated open space network are contained within different parts of the Framework Plan. However, I suggest that the Framework Plan would benefit from inclusion of an integrated open space plan that brings all these open space and network features into one view.

141. Because each of the individual elements are currently not drawn together into a single spatial framework which shows that network, there is a risk that opportunities for better integration of the future open space networks may be lost, and that elements of the network might well be whittled away through future decision making processes.
142. I also suggest that the walking trail and recreational cycling networks be reviewed and shown on the integrated open space plan to ensure that they are properly linking communities to these spaces.
143. I make the following comments in relation to the strategic merit of specific environmental feature/outcomes described in the Framework Plan:

#### **7.2.1. Landform and View lines**

##### North:

144. The most significant landform in this area is the Lovely Banks Monocline. The Framework Plan makes multiple text references to the role that this feature will play in providing open space, recreation, place-making, viewing and biodiversity features, and it also identifies that more technical assessment is required to determine the extent to which it is capable of accommodating urban development.
145. The Framework Plan does not explicitly identify this feature as having a regional landscape or open space function. Whilst the physical extent of the monocline escarpment is shown in the Framework Plan, the underlying land use of most of this feature is also shown as being residential. This sets a clear expectation that the majority of the monocline (save for those parts that are waterways) will have houses constructed in it.
146. Whilst I have no issue with housing being delivered in the Monocline, I consider that given its importance to the future function and amenity of this growth area, greater clarity needs to be provided in terms of how parts of this landscape feature is expected to form part of a wider regional open space system or views to and from features in the public domain along the monocline. For example, its strategic role in the wider natural and future urban landscape in providing public realm and open space connections across the growth area could be conceptually shown in the 'Landform' section of the Framework Plan.

##### West:

147. The Western Framework Plan identifies substantial landforms that either cannot be developed or are intended to be set aside as landscape or geological features.
148. The future reuse of the Batesford Quarry as a lake with public access along its perimeter will be an iconic feature of this growth area over the long term.

149. There are some areas of land along the Moorabool River that are shown as being suitable for residential purposes that are quite steep, and it will be necessary to undertake further analysis of these slopes to determine whether these areas are suitable for urban development. Aside from (or in addition to) development feasibility considerations, there may be a need to set aside some of these areas because of the contribution that they make to the landscaped setting of the Moorabool River - this potential could be foreshadowed in the future urban structure and on a new Action in the Plan.

### **7.2.2. Water**

150. The Framework Plan contains a spatial plan showing waterways, floodplains and indicative waterway and basin locations. It also contains a series of actions which address how the detail of waterway design will be resolved in future planning phases.

151. The spatial plans are based on various stormwater modelling analyses referenced in the plan. The technical analysis that has informed these plans is outside of my expertise to comment on. However, I support the identification of existing waterways and floodplains, and the likely regional scale stormwater assets in the Framework Plan, noting that the final location and design of future stormwater assets will be confirmed during future PSP processes.

### **7.2.3. Biodiversity**

152. The Framework Plan contains a spatial plan showing known existing biodiversity values in each corridor. The biodiversity studies released alongside the Framework Plan are very broad-based studies and they identify that both growth areas support several threatened species and ecological communities that are protected under the Commonwealth EPBC Act.

153. The field assessments that informed these plans covered only 53% of land in the North and 75% in the Western Growth Areas. Therefore, the extent of knowledge of the biodiversity values in each corridor at this point is very incomplete.

154. The Framework Plans call for the preparation of biodiversity conservation strategies prior to the finalisation of the initial PSP in each growth corridor.

155. This is not an ideal approach because it leaves open the possibility that some areas of land will need to be retained for conservation purposes, which in turn may well influence the future urban structure for the wider corridor.

156. However, in the absence of biodiversity conservation strategies having been prepared for the growth areas at this point in time, I accept that the approach proposed to these issues is workable.

157. I also note that the Framework Plan contains a regional scale biodiversity linkage plan for each corridor. Whilst I support the notion of creating opportunities to connect biodiversity values in the urban landscape, it is not clear how these would translate on the ground and I am not aware of

specific ecological studies that have informed this plan (other than the relatively general guidance set out in the Ecology & Heritage Partners reports).

158. I also suggest that the aspiration of creating biodiversity linkages through urban neighbourhoods is something that could be incorporated into the integrated open space plan that I have referred to earlier.

#### **7.2.4. Aboriginal Cultural Heritage**

159. The Framework Plan contains a spatial plan showing existing and potential areas of archaeological significance, together with a series of actions which address how aboriginal cultural heritage values will be protected through future phases of planning and development.

160. The spatial plans are based on aboriginal heritage assessments referenced in the plan. The technical analysis that has informed these plans is outside of my expertise to comment on. However, I support the identification of known and potential cultural heritage values in the Framework Plan, noting that these will be investigated in further detail via PSP- specific studies and CHMP approvals processes in future.

#### **7.2.5. Post-contact Heritage**

161. The Framework Plan contains a spatial plan showing existing and potential areas of post-contact significance, together with a series of actions which address how these cultural heritage values will be protected through future phases of planning and development.

162. The spatial plans are based on post-contact heritage assessments referenced in the plan. The technical analysis that has informed these plans is outside of my expertise to comment on. However, I support the identification of known and potential cultural heritage values in the Framework Plan, noting that these will be investigated in further detail via PSP and site- specific studies.

#### **7.2.6. Built Environment**

##### North:

163. I support the general approach to dealing with the future re-subdivision of rural living properties, utility corridors and contaminated land as set out in the Framework Plan.

##### West:

164. I support the approach proposed to protecting the rural settlement chapter of the Batesford Township. There is scope to improve the clarity in relation to the types of land uses that might be permitted around the Batesford township, for instance:

- Action W1.6.1 notes that a buffer of low-density residential development is established around the north and west of the township.
- Action W1.6.2 says that rural living properties to the east of the township will be permitted to transition to low or conventional density as part of detailed planning of the town, and
- Action W1.6.3 says that rural living will be permitted to subdivide to conventional residential densities as part of urban development (but it does not define which rural living areas are being referred to)

165. Whilst Action W1.6.3 is clear, Actions W1.6.1 and W1.6.2 are open to interpretation. I understand these Actions to mean that conventional or higher density development is prohibited on lots directly facing the Midland Highway, west of Lynnburn Road (Action W1.6.1) but that the rural living properties west of Lynnburn Road that do not directly face the Midland Highway can transition to low or conventional density over time (Action 1.6.2). However, it is possible to interpret the wording of these Actions differently.

166. If my interpretation of these Actions is correct then I suggest that the wording of Action W1.6.2 be amended as follows:

*“Rural living properties to the east of Batesford township (west of Lynnburn road) will be permitted to transition to low or conventional density residential as part of the detailed planning of Batesford township and its surroundings. This does not apply to land adjoining the Midland Highway where conventional or higher residential development is prohibited (as described in Acton W1.6.1)”*

167. The Framework Plan also identifies an area of 'lakeside residential (future investigation of conservation). This is a relatively small development parcel that may not have sufficient scale function as a neighbourhood. There may be other constraints to this land being developed for residential purposes. I suggest that the description of this land in Framework Plan be amended to say 'investigation area: potential urban - subject to assessment of site constraints.'

#### **7.2.7. Surrounding Areas.**

168. I support the general approach to dealing with the impacts of land uses and infrastructure on land surrounding the growth areas.

### **7.3 Neighbourhood**

#### **7.3.1. Neighbourhood Design**

169. The neighbourhood vision (pp120-121) clearly describes what the Framework Plan is seeking to achieve - walkable '20-minute neighbourhoods' connected to each other and the wider world via the C&CC.

170. I support the concept of creating walkable, self-contained neighbourhoods but I query whether a 10-minute neighbourhood might be a more accurate descriptor of the vision given the regional context of these growth areas.
171. For example, the city of Greater Bendigo Planning Scheme incorporates the following description of a 10-minute neighbourhood:
- “A 10-minute neighbourhood is an identifiable community where people can access many (but not necessarily all) of their daily needs within a 10-minute walk or cycle trip from where they live. Daily needs can include shops, schools, employment, a range of community facilities and public transport.”*
172. A person can walk 800m or cycle 2.5km in 10 minutes. These seem to me to be a more appropriate spatial parameters from which to plan each neighbourhood than a 20-minute walking/cycling catchment in a suburb within a regional city.
173. This section of the Plan could summarise what it sees as being the essential ingredients of a 10 minute neighbourhood - e.g. a neighbourhood that has a town centre, schools, childcare, health, open space, recreation and other services within it, and a population of circa 8-10,000 people living within a compact, walkable neighbourhood (i.e. where residential densities enable the majority of residents live <800m of the above features/services).
174. The Plan should also provide definitions for what is meant by low, conventional, medium and high density. This will be particularly important for ensuring that future precinct plans direct appropriate levels of medium and higher density housing within the C&CC to support the transit-oriented aspirations of this corridor.
175. In relation to Action N2.1.5, I consider that the design outcomes described for the monocline are open to very wide interpretation (particular in terms of how much of the monocline is intended to be public land and also how lots and dwellings are expected to fit within it). Whilst it is not possible to entirely resolve this issue at the Framework Plan level, the document could more clearly signal the range of possible outcomes on the Monocline (liner trails, viewing models, etc) in the format of text preceding images or 3-D conceptual sketches.

### **7.3.2. Neighbourhood Amenity**

176. The commitment to higher density tree planting in these growth areas is an important means of addressing the ESD and liveability goals of the Plan and is supported.

### **7.3.3. Neighbourhood Sustainability**

177. The various Environmentally Sustainable Development (ESD) actions in the Framework Plan will assist in achieving its ESD goals. However further research and development needs to be done in

relation to many of these actions (for example Actions W2.3.3, W2.3.4, W2.3.5, W2.3.6 and W2.3.8) for them to be implemented as part of the PSP process).

178. I support the pursuit of neighbourhood sustainability outcomes described in the Framework Plan and I recommend that a program needs to be created to enable this R&D to occur alongside PSPs, infrastructure plans and business cases, etc.

#### **7.3.4. Housing**

179. The actions contained within this element provide appropriate directions on the desired housing outcomes and are generally supported.

#### **7.3.5. Social Infrastructure**

180. This chapter clearly sets out the social infrastructure needs of the growth area, and the planning parameters for its delivery. It provides enough direction over the preferred location of different forms of social infrastructure without being overly prescriptive. It leaves the final determination of the specific need and location for particular infrastructure in each precinct to the PSP process which is an appropriate and typical practice for the planning of such infrastructure.
181. I suggest that the Framework Plan explain the role that Plans 24 and 27 play in directing where certain types of social infrastructure are intended to be located (the role of Plans it is not referenced in the text as far as I could see). Providing this direction to the preferred locations for community facilities and sport reserves will ensure that there critical building blocks of Local neighbourhood are co-located with other infrastructure in each neighbourhood.
182. The implications of the gas pipeline buffer on the location of certain types of social infrastructure (community centres, schools, sports pavilions) could be spelt out more clearly in this section of the plan (or alternatively in Action N1.6.8).

### **7.4. Economy**

#### **7.4.1. Activity Centres**

##### North:

183. The proposed activity centre network and hierarchy will fulfil the 20-minute neighbourhood aspirations of the Framework Plan, and wider state policy. The total population within the growth area appears to be large enough to support four town centres (one of which would function as a sub-regional centre), and these centres could be placed within the growth area in a manner which enables each to draw from a catchment of circa 8-10,000 people, each within a reasonable walking or cycling distance.

184. I note that the economic analysis undertaken by Tim Nott on behalf of Council recommended that there be three town centres in the Northern Growth Area. His analysis noted that the northernmost neighbourhood centre would only draw from a catchment of less than 5000 people which would not be large enough to support a full line supermarket (although I note that his report seems to be based on a total population of circa 43,000 in the growth area whereas the Framework Plan caters for circa 48,000).
185. I defer to Mr Nott and others on the economic viability of planning for four versus three town centres in this area, however it is my view there are urban planning benefits to planning for an additional town centre (greater walkable access to services for instance) if this can be made to work from an economic viability perspective.
186. The northernmost neighbourhood centre is proposed to be located within the gas pipeline measurement length identified by APA. As noted elsewhere in my evidence statement, it is necessary to confirm whether this outcome is acceptable or not.

West:

187. The proposed activity centre network and hierarchy will fulfil the 20-minute neighbourhood aspirations of the Framework Plan, and wider state policy. The total population within the growth appears large enough to support six town centres (one of which would function as a sub-regional centre), and these centres could be places within the growth area in a manner which enables each to draw from a catchment of circa 8-10,000 people, each within a reasonable walking or cycling distance.
188. I also note that the economic analysis undertaken by Tim Nott recommended that the sub-regional centre be located on the Hamilton Highway, whereas the Framework Plan shows this centre northern north between the highway and McCanns Lane.
189. I can see that the location shown in the Framework Plan will have a higher internal amenity (being located away from the highway) but it will also be less accessible to passing trade along the highway which may impact its overall growth potential. Locating the town centre further north also results in it having an overlapping trade catchment with the neighbourhood centre to its north.
190. I consider that the town centre could be moved further south, potentially on the north side of the waterway that runs to the north of the Hamilton Highway. Resolving the final location of this centre could be deferred until the PSP stage in order to explore in more detail the relative pros and cons of the location options.

**7.4.2. Planning for employment**

191. The employment vision contained within the Framework Plan largely focuses on the proximity of the growth areas to nearby employment precincts in Geelong, and to the role of activity centres in

creating local economic activity. In my view this is a realistic approach to take given that the land within the growth areas do not have any unique anchors on which to drive economic growth (such as a CBD, waterfront, university, port, rail hub, etc.) but it is close to locations that do.

192. The Framework Plans seek to cater for the creation of 14,000 jobs in the Northern Growth Area and 21,500 jobs in the Western Growth Area. These job forecasts appear to have been based on analysis undertaken by SGS, which is based on each corridor generating jobs relating to *local* economic activity, and a share of *district* economic activity as well.
193. The SGS analysis concluded that neither growth area is particularly well located to cater for major clusters of strategic employment land, and that both areas are very close to a wide range of employment hubs within Geelong itself. The analysis also concluded that the growth areas had the potential to accommodate some but not all of the district-level economic activity that it would generate, given that many uses that fit within this category (health, education, professional services, etc.) will seek to agglomerate in larger employment precincts such as the Geelong CBD or Waurn Ponds
194. Whilst I am not an economist, I agree with the urban planning logic of the SGS assessment in the Geelong context.
195. Based on this analysis, SGS concluded that land inside each growth area could support a workforce ratio in the order of 0.55-0.72 jobs per resident workers. The SGS report went on to make some broad recommendations in relation to the amount of land that should be set aside for health, education, office, industrial and retail purposes.
196. The Framework Plan seems to have broadly adopted these recommendations in relation to the provision of industrial land. Whilst it is not clear whether the Framework Plan has adopted the land allocation recommendations for the other nominated uses, this is a matter that can be verified at the PSP stage (which is a usual and appropriate approach to planning for employment in a greenfield context).
197. The SGS report recommended the following three actions to maximise the amount of employment that might be generated within each growth area:
- Ensure that precinct plans provide enough land and amenity for the full suite of local population serving jobs, as well as spaces for the growth of local businesses and start-ups.
  - Selectively provide for district level functions in town centres. This requires the creation of pedestrian-friendly, mixed-use urban scale and high amenity town centres and making provision for commercial floorspace.
  - Help strengthen economic clusters outside the growth are by providing high quality transport connections to them from the growth areas.
198. I strongly support these recommendations.

199. I consider that there is scope for the Framework Plan to be more ambitious in seeking to create spaces that cater for a higher share of local employment than might otherwise occur in outer urban areas. It should seek to create more urban scale and mixed-use town centres that offer an amenity that can support the creation of local workspaces for residents to set up businesses.
200. These workspaces might range from opportunities for live/work as well as spaces for residents to work close to home, in shared workspaces, smaller-scale offices, and local office/warehouses that cater for the self-employed and small business operators.
201. This would not necessarily require more land to be set aside in the Framework Plan but rather for this aspiration to be stated in the Framework Plan, so that the next more detailed phases of planning and economic development can seek to deliver a wider range of workspaces that cater for local business growth.
202. I suggest that additional Actions be included in the Framework Plan which encourage the creation of live/workspaces as well as spaces for local residents to work close to home, in shared workspaces, smaller-scale offices, and local office/warehouses.
203. I suggest that consideration be given to identifying opportunities for live-work spaces within the C&C Corridor (Plans 28 and 29), as well as small scale offices and potentially also office/warehouse activities within or on the edges of town centres.

## **7.5. Movement**

### **7.5.1. Active Transport**

204. The Framework Plan contains a spatial plan showing proposed active transport networks, together with a series of actions which address how these networks will be delivered through future phases of planning and development. I support the intent of this network, and the proposed actions to deliver it.

### **7.5.2. Public Transport**

205. The Framework Plan contains a spatial plan showing the key features of the proposed public transport network. I support the intent of this network, and the proposed actions to deliver it.

### **7.5.3. Integrated Transport**

206. The Framework Plan contains a spatial plan showing the key features of the overall integrated transport network. This plan shows the relationship between the C&CC and the arterial and connector street network.
207. I support the general intent of this network, as the C&CC will provide a pedestrian and cycle spine through the corridor whilst the surrounding arterial and connector roads will still efficiently distribute private vehicles in and out of the growth area, as well as provide reasonable levels of vehicle access to each town centre.

### **7.5.4. Delivery**

### **7.5.5. Utilities and Infrastructure**

208. The Framework Plan contains a spatial plan showing the location of key utility services, together with actions to undertake more detailed service planning to ensure the orderly delivery of services over time.
209. The technical analysis that has informed these plans is outside of my expertise to comment on. However, the actions requiring more detailed service planning to be undertaken as input to more detailed stages of planning are sound, and I support the general approach relating to the funding of local infrastructure and the delivery of infrastructure to the ultimate standard where practical.

### **7.5.6. Development Sequencing**

210. I set out my views in relation to development sequencing in section 10 of my evidence.

### 7.5.7. The Precinct Concept Plans and Infrastructure Requirements

211. The Framework Plan contains a series of precinct concept plans and an associated list of infrastructure requirements. The purpose of this information is not explicitly set out in the Framework Plan, but I presume that it is to provide detailed guidance for what each of the future PSPs and associated ICPs needs to address.
212. Whilst these concept plan essentially just show the various layers from elsewhere in the Framework Plan on a single diagram, they imply a higher degree of resolution of the land use and infrastructure layout than is realistic at this stage in the strategic planning process. I suggest that a statement of limitations is included in the Framework Plan explaining that these are only intended to show the potential combination of land uses, constraints and infrastructure requirements that need to be addressed at the PSP stage, and that the plans do not represent a final or preferred urban structure for the precinct.
213. The list of infrastructure requirements also implies a higher degree of resolution of what infrastructure is likely to be needed in each precinct than is realistic at this stage in the strategic planning process. However, including this as an indicative list is helpful in a. managing expectation and b. long term planning on the part of landowners and government agencies. On balance, I favour including it in the Framework Plan.
214. Nonetheless I suggest that a statement of limitations is included in the Framework Plan explaining that their purpose is to identify the broad infrastructure needs for each precinct, but that these will be refined as each PSP is prepared.

## 8. The Planning Scheme Amendment

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215. I have been asked to outline my opinion on the planning scheme amendment implementing the Framework Plan.
216. Amendment C395 proposes to (inter-alia):
- Insert a new Clause 21.20 Northern and Western Geelong Growth Areas including new objectives, strategies, references and plans to implement the Northern and Western Geelong Growth Areas Framework Plan;
  - Include the *Northern and Western Geelong Growth Areas Framework Plan (2019)* as a Background Document under Clause 72.08.
  - Rezone areas of land in the Northern and Western Geelong Growth Areas from Rural Living Zone, Farming Zone, Public Park and Recreation Zone and Industrial 1 Zone to Urban Growth Zone.
217. The Objectives and Strategies contained within the proposed clause 21.20 reflect the key directions from the Framework Plans.
218. The key ‘implementation’ strategies of the draft Clause 21.20-4 are as follows:
- Ensure land use and development proceeds generally in accordance with the Northern and Western Geelong Growth Areas Framework Plan.
  - Develop Precinct Structure Plans for each growth area in accordance with the sequencing set out in the Northern and Western Geelong Growth Areas Framework Plan.
219. These strategies are supported by an ‘implementation’ provision at clause 21.20-4 which proposes to apply the Urban Growth Zone to most land in the Northern and Western Geelong Growth Areas, but excluding specific land based on it either remaining non-urban or requiring further investigation.
220. I address each in turn below.
- 8.1. The role of the Framework Plan in decision making under the planning scheme:**
221. I support the underlying intention of Clause 21.04 in seeking to ensure that land use and development proceeds generally in accordance with the Framework Plans.
222. However, I can foresee some issues with the application of the Framework Plans in relation to decision making on future planning scheme amendments and permit applications if they are given effect in the manner currently proposed.
223. Amendment C395 proposes that the Framework Plan be listed as Background Documents under clause 72.08. It is accepted that Background Documents (formerly described as Reference

Documents) are not legally part of the planning scheme and should not be relied upon as the basis for making decisions under the planning scheme.

224. Planning Practice Note 13 ('incorporated and reference documents') provides the following guidance in relation to the role of background (reference) documents:

*"Reference documents have only a limited role in decision-making as they are not part of the planning scheme. They do not have the status of incorporated documents or carry the same weight."*

*"Many documents, while useful, may be too long or complex or cover too wide a subject matter to be suitable for inclusion as an incorporated document in the scheme. If they provide useful background information or general advice to applicants, or will assist in understanding the scheme, they may be suitable as reference documents."*

*A reference document may explain why particular requirements are in the scheme, substantiate a specific issue or provide background to specific decision guidelines in local planning policies or schedules. Generally, the substantive planning elements of the reference document will have been included in the scheme in either the MSS, a local planning policy or a schedule."*

225. I consider that as drafted the Northern and Western Growth Area Framework Plans are not suitable for incorporation into the planning scheme because they are too long and cover too wide a subject matter to be suitable as a decision-making tool under the planning scheme.
226. However, they provide high useful background information and general advice to applicants, and I expect that they will assist in understanding the provisions that are included in the scheme. For these reasons I consider that the Framework Plans should be referred to in the planning scheme as background documents.
227. The current wording of the draft Clause 21.02-4 is to 'ensure that land use and development proceeds generally in accordance with the Northern and Western Geelong Growth Areas Framework Plan'.
228. In my opinion it is not appropriate for policies or strategies within a planning scheme to rely upon material contained within Background Documents as the basis for making decisions.
229. This view is supported by the findings of the Planning Panel members that considered Amendment C67 to the Macedon Ranges Planning Scheme. This amendment sought to give effect to the Gisborne Outline Development Plan (proposed as a reference document) via strategies within clause 21 of the planning scheme.

230. into the planning scheme. The Panel made the following observations regarding the intended role of reference documents:

*“...the ODP is a Reference Document and, as such, does not have any formal statutory ‘weight’. In this context it is inappropriate for an MSS strategy to require adherence with the ODP. The Panel agrees with Mr Montebello that this strategy [the strategy within the MSS] should refer to the ODP Map included in the MSS, rather than the ODP itself. The Panel also agrees with submissions that sought a requirement that decisions be ‘generally’ in accordance with the ODP Map. This change would provide Council with a reasonable degree of flexibility in applying and interpreting the ODP Map.”<sup>15</sup>*

231. In my view there are a few alternative ways that the Amendment could be drafted to ensure that land use and development proceeds generally in accordance with the Framework Plans.

232. For example, the relevant strategy in Clause 21.20-04 could be re-drafted as follows:

*“Ensure land use and development gives effect to the growth area objective set out in Clause 21.20-2, is be in general accordance with the spatial framework plans set out in Clause 21.02-5.”*

233. This could potentially be supplemented by a strategy along the following lines:

*“Land use and development should have regard to with the Northern and Western Geelong Growth Areas Framework Plans [in the Background documents].”*

234. An alternative approach would be to leave wording of the relevant strategy as it is drafted but create an abridged version of the Northern and Western Geelong Growth Areas Framework Plans and incorporate these into the planning scheme.

235. This new incorporated document should be heavily pared back to just the two Framework Plans, the associated thematic maps and headline ‘Actions’ (text in blue), together with an abridged ‘delivery’ chapter that contains policy guidance (but not prescriptions for) the spatial layout and infrastructure requirements of each precinct, and development staging.

236. Under this option the existing Framework Plan could remain as a Background Document in order to provide the wider context for the incorporated document.

237. I prefer the first of these two options as it would mean that the substantive planning elements of the background document will have been included in the scheme (as described in the Practice Note).

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<sup>15</sup> Amendment C67 Panel report, page 69

238. The second option would require the 'incorporated plan' version of the Framework Plans to be carefully edited to ensure that it is written in language which can clearly guide decision making on planning scheme amendments and permits. Even with careful editing, it is likely that 'actions' within the document will still be subject to wide debate about their interpretation.

## 8.2. Development sequencing:

239. The Framework Plan currently specifies a development sequence for each of the proposed PSP and clause 21.20-04 specifies that PSP will be prepared for each growth area in accordance with this sequence.

240. The Framework Plans describe the sequences in terms of a short, medium and long term, but it does not define what each time frame means in terms of years. It contains actions (Action N5.2.1 and W5.21.1) which specifies that the commencement of any PSP will be initiated by the City based on 'strategic policy and budgeting' and it sets out five factors that will be considered in making a decision to initiate a PSP.

241. I support the underlying intent of Clause 21.04 to ensure that land use and development proceeds generally in an orderly sequence. I also noted that defining a preferred development sequences in areas of growth to better coordinate infrastructure planning and funding is explicitly supported by State planning policy<sup>16</sup>.

242. I consider that that the sequencing criteria set out in actions N5.2.1 and W5.2.1 should be included within the local policies within the planning scheme, and amended to include consideration of the following factors:

- Whether the precinct will enable the staged extension of infrastructure networks in a way that minimized the real cost of infrastructure provision.
- Whether or not a precinct subject to major constraints or uncertainties that could delay development and are of a size and with a pattern of land ownership that is likely to result in a substantial and predictable yield of housing and or industrial land.
- Whether a precinct's development will support thee effective and early development of public transport infrastructure, town centres and employment precincts<sup>17</sup>.

243. If the sequencing criteria were included within the planning scheme, then I do not consider it to be necessary for a specific order of PSP sequencing to be mandated by the planning scheme.

244. If the Framework Plans were to retain their status as Background Documents then they could include an indicative staging plan for urban growth across both corridors (based on say 5 year timeframes for the completion of precinct plans) but in my view final decision on PSP timing should

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<sup>16</sup> Clause 11.02-3S

<sup>17</sup> These additional criteria have been derived from the sequencing criteria contained within the Melbourne Growth Area Framework Plans, page 35 (GAA, 2012)

be made by Council as a separate step, based on the analysis of land supply, infrastructure costs and other sequencing criteria described above.

### **8.3. The Urban Growth Zone:**

245. The 'implementation' provision at clause 21.20-4 propose to apply the Urban Growth Zone (UGZ) to most land in the Northern and Western Geelong Growth Areas, but excluding:
- Batesford township and a surrounding buffer.
  - Rural Conservation Zone applying to Dog Rocks Sanctuary and adjacent land.
  - Further investigation areas.
  - Existing rural living properties identified for Employment.
  - Existing Special Use Zone applying to the Batesford Quarry and adjacent land.
  - Other existing zones reflecting existing and intended ongoing land use.
246. Amendment C395 proposes to apply the UGZ to land within the growth boundary which is intended to be developed for future urban purposes, and to retain the remaining in land in a combination of other zones, on the basis that this land is either not intended to be developed for urban purposes, or there is a need for further investigation to occur to determine whether the land is suitable for urban development or not.
247. I support the above approach to applying the UGZ on the basis that they will provide for the orderly transition of relevant parts of each growth area from rural to urban purposes. The UGZ is now a well-established and widely used tool for facilitating urban development in growth areas across the State.
248. The UGZ provides for the protection of land for future urban purposes prior to PSPs being in place (part 1 of the zone), and the implementation of PSPs once they have been prepared (part 2 of the zone, in concert with relevant zone schedules).
249. I consider that the UGZ is the most appropriate zoning provision to apply to developable land within the growth area given the extensive area of land contained within the Framework Plans and the long timeframes associated with its development.
250. It is possible that the UGZ may be extended to apply to additional land within the growth area, but this is depended on the outcomes for the specific investigations referred to within the Framework Plan document. I also consider this to be a prudent and orderly approach to the future planning of these investigation areas.

## 9. Issues Raised in Submissions – The Framework Plan Contents

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251. I have been asked to outline my opinion on the issues raised in submissions relating to particular land use and development outcomes in the Framework Plan.
252. Given the large number of submissions received, I have approached this task by addressing the issues by the themes set out in the Council Officer report dated 24<sup>th</sup> September 2019. The following is a summary of each of the main issues raised (as set out in the Council Officer report) and my opinion in relation to them.

### 9.1. Planning process:

#### *Summary of Submissions:*

253. 13 submissions raise issues regarding both the planning process to date for NWGGA as well as future planning processes throughout the development of the growth areas.
254. Regarding the process to date submitters argue:
- insufficient consultation with landowners and insufficient notification of amendment;
  - concerns previously raised have not been addressed;
  - perceived bias towards a NGGA landowner consortium;
  - amendment pre-empts a VCAT hearing on a planning permit application in the WGGA.

#### *My Opinion:*

255. I have reviewed the summary of the consultation program undertaken by Council as set out in the officer report dated 24<sup>th</sup> September 2019. I am satisfied that there has been sufficient opportunities for landowners and the wider community to engage with Council and make submissions in relation to the future planning of the Northern and Western Growth Areas. The planning scheme amendment process provides a further opportunity to parties to express their views and for these to be considered by an independent panel appointed by the State Government.
256. I note concerns raised in submissions relating to a function centre proposal that I understand has recently been considered by VCAT. I do not consider that the preparation of long-term plans for these two growth corridors is pre-emptive of VCATs consideration of this appeal.

## 9.2. Development Levies:

### *Summary of submission:*

257. Eight submissions raise issues of shared funding and development levies. Most of these submissions express the importance of shared funding – by way of Development Contribution Plans (DCPs) or Infrastructure Contribution Plans (ICPs). Several seek clarity on the mechanism. Arguments raised include:

- the Framework Plan must outline the essential principles for shared funding;
- a precinct-by-precinct approach must be taken;
- a standardised regional ICP should be applied;
- ICP infrastructure items must be priced and apportioned before resolving first PSPs;
- include development levies, or a mechanism for this, in this amendment;
- include drainage in shared funding; and
- third-party funding of technical studies to inform PSP preparation should recoup costs from non-participating owners.

### *My opinion:*

258. I acknowledge that the Framework Plan contemplates a wide range of regional and neighbourhood scale infrastructure, and that it will be necessary to resolve what infrastructure is to be delivered via DCPs or ICPs versus developers, Council, State or Federal funding.

259. However, the role of the Framework Plan is not to resolve how the infrastructure required to support the proposed growth is to be funded. Guidelines are in place in relation to the use of DCPs and ICP to fund works (specific guidelines for regional ICPs are also under development). Council may wish to prepare an infrastructure funding/coordination strategy, to assist it in the forward planning of infrastructure delivery. State and potentially Federal Government will also have a role to play in the funding of certain categories of regional infrastructure.

260. Lastly, I note and support the response made in the officer report in relation to the submissions on funding of drainage works and technical studies.

## 9.3. Land Acquisitions

### *Summary of submission:*

261. Three submissions express concerns regarding potential compulsory acquisition of land within the growth areas.

### *My opinion:*

262. I note and support the response made in the officer report that any land required for public infrastructure will be identified as part of future planning processes (including the preparation of

PSPs or upgrades to declared road upgrades), with compensation derived from the relevant DCP/ICP or via other processes – noting that various acts including the Road Management Act, Planning and Environment Act and Land Acquisition and Compensation Act govern how public authorities must undertake land acquisitions and compensations.

#### **9.4. Lot Yield**

##### ***Summary of submission:***

263. Two submissions point out that the total lot yield for the Western Growth areas in the Framework Plan differs from that assumed in Table 1 of the Settlement Strategy.

##### ***My opinion:***

264. I note the difference in the lot yield figures but I cannot comment on them because there is insufficient information in either document about how each figure has been calculated. I acknowledge that both a regional strategy and regional framework will by necessity be calculating lot yields based on some broad assumptions, and that even small adjustments on variable such as net developable area or dwellings per hectare can generate significant differences in the overall lot yield figures.
265. I note and agree with Councils comments that the level of accuracy on lot yields will increase once individual precinct plans are prepared. Notwithstanding, I consider that it would be helpful for the assumptions behind the lot yields in each document to be set out in an appendix to each document. This would enable users of the document to understand their basis and why the figures might change in subsequent more detailed stages of planning.

#### **9.5. Clever and Creative Corridor:**

##### ***Summary of submission:***

266. Eleven submissions raise various issues with the proposed C&CC.
267. Issues raised include:
- general support;
  - concern with the Corridor alignment in each growth area and suggestions for realignment;
  - concern that the Corridor conflicts with landform and Moorabool River corridor;
  - concern at potential substantial land requirements for the Corridor along Evans Road between growth areas;
  - remove Corridor components and dimensions from Framework Plan;
  - detailed design suggestions for the Corridor;
  - impact of the Corridor on existing business operations; and
  - concern at insufficient market demand for higher density housing along the Corridor.

***My opinion:***

268. I am not qualified to comment on the technical transport engineering aspects of the C&CC. However, I support the role that this transport initiative will have in achieving the overall liveability, sustainability and accessibility goals of the Framework Plan. I see a variety of potential urban planning benefits to the concept and whilst I acknowledge that there are a number of technical issues that need to be addressed regarding the design and function of the corridor, I fundamentally support the reservation of land for the corridor as part of both the Framework Plan and future PSP
269. The importance of reserving land for longer term transport initiatives is readily illustrated by precedents such as Eastlink and the Outer Metropolitan Rail (OMR) line projects and the Armstrong Creek – Torquay transit link. Critical transport projects such as Eastlink and the OMR would have been able to be realised if sufficient land was not set aside at the time that the surrounding suburbs were planned and developed.
270. I have made some suggestions for how the concept might be more clearly articulated in the Framework Plan in an earlier section of my evidence statement
271. My opinions on the specific issues raised in submissions are as follows:

***The Corridor alignment:***

272. I acknowledge that whilst some technical work has been done to develop the C&CC concept and its alignment, the initiative remains conceptual and will require further research and development in order to resolve its ultimate alignment, design and function.
273. In my opinion, the purpose of including the concept in the Framework Plan is twofold – to articulate the concept of an integrated land use and transport corridor and to signal that land will need to be set aside to facilitate the delivery of alternative forms of public transport alongside active transport modes.
274. I acknowledge that some submitters are concerned about potential technical difficulties and/or cost penalties associated with the corridor shown in the Framework Plan. However, resolving the type of public transport services that might operate within the corridor and the associated infrastructure that such services might need may well take many years to resolve and there is a need to ‘put a stake in the ground’ with the concept in the Framework Plan now.
275. It is necessary to show an alignment in the framework plan because a series of related land uses are correlated to the corridor. However, showing a particular corridor alignment in the Framework Plan does not mean that the precise alignment is fixed. Further technical analysis of the transport options for the corridor will occur alongside the development of precinct plans along the corridor.

Opportunities will exist to make changes to the alignment of the C&CC as part of these future processes. Whilst some of the alternative alignment put forward by submitters may prove to have merit, I consider that these adjustments can be made as part of future precinct planning processes (or a more detailed corridor wide technical review, whichever occurs first).

Potential conflicts with landform and Moorabool River corridor:

276. Refer comments above

Land requirements for the Corridor along Evans Road between growth areas:

277. I note and agree with the Council officer response that Evans Road is the logical existing road alignment to facilitate transport movements between the two growth areas. The transport corridor in this non-urban area will be limited to a movement corridor and so I expect that the land requirements associated with it will be limited to a 14-metre land allocation to create a dedicated, separated median reserve for active and public transport movements.

Removal of Corridor components and dimensions from Framework Plan:

278. I do not support removing the corridor components and dimensions from the Framework Plan. As noted earlier, I consider that the purpose of including the concept in the framework is to articulate the concept of an integrated land use and transport corridor and to signal that land will need to be set aside to facilitate the delivery of alternative forms of public transport alongside active transport modes.

279. In order to achieve this, it is necessary to show both the corridor components and the expected corridor dimensions in the Framework Plan. However, as I have noted earlier in my evidence, I consider that there is scope to simplify the description of C&CC components in the Framework Plan.

Detailed design suggestions for the Corridor:

280. Further technical analysis of the transport options for the corridor will occur alongside the development of precinct plans along the corridor. Opportunities will exist to make changes to the conceptual design of the C&CC as part of these future processes. Whilst some of the alternative design solutions put forward by submitters may prove to have merit, I consider that these adjustments can be made as part of future precinct planning processes (or a more detailed corridor wide technical review, whichever occurs first).

Impact of the Corridor on existing business operations:

281. The potential impacts of the C&CC on existing business operations are matters that can be addressed as part of future precinct planning processes (or a more detailed corridor wide technical review, whichever occurs first).

Concern at insufficient market demand for higher density housing along the Corridor:

282. Action N2.17 and W 2.16 state that medium density housing requirements will be applied within 400m of locations on the C&CC that offer employment, public transport access and community hubs.
283. I do not consider that it is possible to say with any certainty today what the market demand for medium density housing might be in the medium and long term, or what impact creating the C&CC might have on supporting demand for such housing.
284. The levels of public transport services envisaged for the C&CC will only be possible if residential and other land use densities within the walking/cycling catchments of activity nodes along the C&CC are sufficiently high to sustain the level of trip generation needed to support high frequency services.
285. Equally, demand for medium density housing in the Corridor will be influenced by the level of amenity and accessibility that is available in the location. So there is a symbiotic relationship between the transport network and the urban density that surrounds it - if Council wishes to realise a high frequency PT service that is a viable alternative to private car use, then it needs to plan for an urban density that will support this.
286. If the medium density requirements referred to in Action N2.17 and W2.16 are removed or reduced then this will have a direct impact on the population catchments that the corridor would service, the likely patronage demand and ultimately the viability of higher levels of PT service on the route.
287. In that event, I would expect the viability of the C&CC as a frequent connection between neighbourhoods and to Geelong and Melbourne (and therefore a viable alternative to private motor car trips) to be in question, and it may be necessary to default to a more 'business as usual' transport solution along this corridor, which would be disappointing to say the least.
288. For these reasons I do not support removing or reducing the medium density requirements referred to in Actions N2.17 and W2.16.

## 9.6. Activity Centres

### *Summary of submission:*

Five submissions raise issues related to activity centres within the growth areas. Changes requested include:

- Relocate the NGGA sub-regional centre to the northeast;
- Replace the north-eastern NGGA neighbourhood activity centre with two centres;
- Change NGGA neighbourhood activity centre retail floor space range in Framework Plan;
- Relocate the WGGA sub-regional centre north to abut Midland Highway;
- Include one or both activity centres shown on the boundary of the Creamery Road and Batesford North precincts in the Creamery Road PSP; and
- Shift focus of WGGA neighbourhood activity centre to the north-west, adjacent to future rail station.

### *My opinion:*

289. I am not qualified to comment on the economic aspects of planning for activity centres within these growth areas. My opinions on activity centre planning solely address the role of activity centres in achieving the neighbourhood planning aspirations of State policy and the Framework Plan (including the 20-minute neighbourhood' design aspirations).
290. I have set out my general opinions on the activity centre network proposed in the Framework Plans in an earlier section of my evidence statement.
291. My opinions on the specific issues raised in submissions are as follows:

#### *Relocate the NGGA sub-regional centre to the northeast:*

292. This change has been proposed in the context of a submission by the same submitter to replace the north-eastern NGGA neighbourhood activity centre with two centres. The submitter notes that the benefits of this alternative arrangement are that an additional 3,500 to 4500 dwellings will be brought into the walkable catchment of retail and community services that are located within these centres.
293. However, moving the NGGA sub-regional centre to the north-east of the proposed location appears to result in this centre being less accessible to future residents within the growth area. The proposed location is closer to the existing rural living area which is flagged as a potential future employment precinct.
294. I do not support moving the location of this centre on the Framework Plan, and I note that the merit or otherwise of this suggestion can be further tested during preparing future PSPs in this growth area.

Replace the north-eastern NGGA neighbourhood activity centre with two centres:

295. There may be a question about the economic viability of planning for one sub-regional and four neighbourhood activity centres although I note that there are differing views amongst the economists which have provided advice to parties on this question.
296. Whilst I defer to the economists on the economic viability of planning for four versus three neighbourhood centres in this growth corridor, I can see some planning merit in the suggested modification. The additional centre will enable a greater number of households to live within walking distance of a neighbourhood centre, and the proposed location of the two centres in the north-east part of the growth area will mean that both centres are located outside what the submitter considers to be the appropriate Gas easement measurement length.
297. However, unless the question of the economic viability of creating four versus three neighbourhood centres in this growth corridor can be resolved as part of the current Amendment process, then I would suggest that the merit or otherwise of this suggestion can be further tested during the course of preparing future PSPs in this growth area.

Change NGGA neighbourhood activity centre retail floor space range in Framework Plan:

298. This is a matter that is outside my professional expertise.

Relocate the WGGGA sub-regional centre north to abut Midland Highway:

299. I understand that one of the primary considerations in relation to the location of this centre was a desire to minimise its impact on the Corio sub-regional activity centre, with a potential loss of 40-50% of existing market share. Determining the potential commercial impact of the proposed location of the WGGGA subregional centre on the Corio centre is a matter that is outside of my professional expertise, so I defer to others on this question.
300. I have reviewed the town planning arguments put forward by the submitter in favour of locating this centre on the north versus the south of the WGGGA. I am not convinced that there is a strong town planning rationale for locating the centre in the revised location as compared to the location shown on the exhibited Framework Plan.
301. The subregional centre is intended to primarily serve the population within the western growth area, as it is intended that the northern growth area will have its own sub-regional centre. In my opinion, there is no need or rationale for the subregional centre to be located central to both growth areas as suggested in this submission.
302. The future populations within the western growth area will be focussed in the northern and southern locations due to the large areas of non-developable land within the central part of the corridor. It is not exactly clear from the Framework Plan what proportions of the overall population

will be located north vs south of the Batesford Quarry, but it appears that neither end of the growth corridor will have a dominant share of the population.

303. In any case, I do not think that the size of the population planned for the northern part of the growth area will of such a magnitude that would compel locating the sub-regional centre in this location to take precedence over the southern location, particular in the context of their being other factors that will influence the preferred location.
304. I am also not convinced that locating the centre in the location proposed by the submitter would support the early settlement of the growth area. Typically, the early settlement of growth areas is supported by neighbourhood and local centres, and the Framework Plan provide for the creation of two neighbourhood centres in the northern part of this growth area. In my view, the establishment of these centres would adequately support the early settlement of the growth area.
305. For the above reasons I do not support locating the WGGa sub-regional centre north to abut Midland Highway.

*Include one or both activity centres shown on the boundary of the Creamery Road and Batesford North precincts in the Creamery Road PSP:*

306. These activity centres have been located on the notional alignment of the C&CC in the Framework Plan. The concept for the C&CC is for an integrated corridor where there is a mix of uses on either side of the corridor.
307. It is possible (but not certain) that all or large parts of these town centres may ultimately fall wholly within one or the other of the relevant PSP. The proposed locations are indicative and will be determined tested during the course of preparing future PSPs in this growth area.

*Shift focus of WGGa neighbourhood activity centre to the north-west, adjacent to future rail station.*

308. This activity centre has been located on the notional alignment of the C&CC in the Framework Plan. The optimal relationship between the activity centre, the C&CC and the proposed future railway station can be determined during preparing future PSPs in this growth area.

## 9.7. Integrated transport network

### *Summary of submission:*

309. 19 submissions raise issues regarding the integrated transport network within and beyond NWGGA. The submissions ranged from broad support for elements of the framework plan to concerns and suggestions relating to specific elements of the transport network.

### *My opinion:*

310. I am not qualified to comment on the technical transport engineering elements of the Framework Plans.
311. I have set out my general opinions on urban planning aspects of the proposed integrated transport network in an earlier section of my evidence statement.

## 9.8. Integrated water management

### *Summary of submission:*

312. 17 submissions raise issues relating to elements of integrated water management – waterways and/or drainage.

### *My opinion:*

313. I am not qualified to comment on the technical waterways engineering elements of the Framework Plans.
314. I have set out my general opinions on urban planning aspects of integrated water management in an earlier section of my evidence statement.

## 9.9. Biodiversity

### *Summary of submission:*

315. The Department of Environment, Land, Water and Planning (DELWP) submission raised issues including:
- Extent and condition of significant environmental values in NWGGA is unknown
  - Native vegetation and protected species, habitats and communities may have significant impact on NWGGA development
  - Potential for delivering offsets on and off site is unexplored
  - Clarification of requirements and scope for biodiversity conservation strategy (BCS)

- Undertake BCS prior to PSP preparation as its outcomes may require changes to Framework Plan
- Recommended changes to proposed policy provisions

316. A range of other Biodiversity issues were raised in other submissions.

***My opinion:***

317. I am not qualified to comment on the scientific aspects of dealing with biodiversity values in the Framework Plans.

318. I have set out my general opinions on urban planning aspects of dealing with biodiversity values in an earlier section of my evidence statement.

319. In relation to the issues raised in the DELWP submission I have noted that preparing Biodiversity Conservation Strategies (BCS) in the period between finalising the Framework Plans and finalising the initial PSPs is not an ideal approach because it leaves open the possibility that some areas of land will need to be retained for conservation purposes, which in turn may well have an effect on the future urban structure for the wider corridor.

320. In my view it would be better if a higher degree of certainty was in place about the biodiversity values in these growth areas, so that decisions could be made up-front about which areas might need to be retained for conservation purposes and which areas could be cleared, subject to securing appropriate offsets.

321. However, in the absence of BCSs having been prepared for the growth areas at this point in time, I accept that the approach proposed to these issues is workable.

322. I consider that it is preferable to proceed with finalising the Framework Plans and completing the BCSs as soon as possible (and before finalising any PSPs) rather than suspending the finalisation of the Framework Plans to allow the BCSs to be completed.

323. In relation to submissions made by other parties on biodiversity issues my views on the town planning aspects of these submissions are as follows:

*Desire for physically connected biolinks through Western Growth Area to minimise habitat fragmentation:*

324. The Framework Plan identifies a series of notional biodiversity linkages in each corridor. I have previously noted that it is not clear how these would translate on the ground, and that and I am not aware of specific ecological studies that have informed this plan (other than the relatively general guidance set out in the Ecology & Heritage Partners reports).

325. I consider that more scientific and technical analysis is needed to determine both the need for and efficacy of creating dedicated physical connected biodiversity linkages versus more generalised

habitat corridors via planting regimes through the future urban environments. The detailed planning of such links can occur at the PSP stage.

Desire for larger lot sizes and development and land use controls on lots abutting Moorabool River, Dog Rocks Flora and Fauna Sanctuary and other reserves:

326. I support there being consideration of development and land use controls on lots abutting these locations. Further technical advice should be sought to inform what the ecological risks are (e.g. light spill, weed invasion, rubbish dumping, cats, etc.) and what the most appropriate design response is.

Plan 17 (biodiversity linkage) premature before waterway/open space alignments determined:

327. From my review of the documents the biodiversity plan appears to have a limited ecological basis to it, and it is also not clear how these biodiversity outcomes would translate on the ground.
328. However, I support there being a strong commitment to creating tangible biodiversity links in each growth area, subject to the form of such links might take being clarified (e.g. wildlife corridors along waterways and walking trails, plantings of native vegetation in parklands and along particular road linkages, etc.).

**9.10. Heritage**

329. Five submissions refer to Aboriginal cultural heritage or post contact heritage.

**Summary of submission:**

330. Five submissions refer to Aboriginal cultural heritage or post contact heritage

**My opinion:**

331. I am not qualified to comment on the cultural heritage elements of the Framework Plans.
332. I have set out my general opinions on urban planning aspects of dealing with cultural heritage values in an earlier section of my evidence statement.

### 9.11. Land use zoning requests

#### *Summary of submission:*

333. Eight submissions make particular land use or zoning requests relating to the NGGA, and 14 submissions make particular land use or zoning requests relating to the WGGA.

#### *My opinion:*

334. I have reviewed and support the responses to these submissions set out in the Officer report dated 24<sup>th</sup> September 2019.
335. The primary purpose of Amendment C395 is to establish a policy framework in the Greater Geelong Planning Scheme for the Northern and Western Growth Areas.
336. The rezoning of land via this Amendment is only proposed to the extent that it seeks to set aside future urban land in the UGZ. This is to ensure that the land designated for future urban purposes is planned in an order manner (via PSPs) and also to ensure that this land is not prejudiced by uses or developments in the intervening period.
337. The Framework Plan identifies several locations where future decisions need to be made about whether to retain areas for their current use (e.g. farming, rural living) or whether to facilitate a transition in their use to residential, employment, conservation or other purposes. Further investigation is needed in relation to these areas, and future PSPs will provide the means for the outcomes of these investigations to be acted on.
338. The process of preparing and approving these PSPs will involve extensive public consultation and so there will be opportunities for these rezoning requests to be determined as part of the future PSP processes.
339. In relation to the submissions requesting that the extend of land for industrial uses be reduced, it is my view that a reasonable area of land needs to be set aside for light industry and service industry purposes, and that such land needs to be in locations that have access to the fright network.
340. As I have set out elsewhere in my evidence statement, I do not thinks that there is a need for large-scale industrial precincts in either growth area, but I do support the provision of some industrial land to service this corridor, and I consider that the quantum and location of such land shown in the Framework Plans is reasonable.

## 9.12. Surrounding land uses

### *Summary of submission:*

341. Eleven submissions raise issues relating to surrounding land and land uses, and the impacts of uses within the growth areas on surrounding land and vice versa.

### *My opinion:*

#### The Lara Energetic Materials Manufacturing Plant (LEMMP):

342. Action N1.7.7 notes that a buffer of 1000 metres will be applied to the LEMMP and that no additional sensitive land uses (including residential development and community facilities) will be permitted within these buffers.
343. The NGGA Framework Plan identifies the land to the immediate south of the LEMMP as 'Agriculture – Future investigation of conservation'.
344. The LEMMP submission requests the following:
- Clause 21.20 to be updated to reference the need to protect its existing buffers
  - N1.7.7 be amended to comply with Worksafe requirements
  - Additional planning provision such as the application of an Environment Significance Overlay be applied to land within the 1000m buffer
  - Modify Plan 23 to remove any suggestion that medium density housing might be supported within the catchment of the C&CC
345. The Council officer report notes that Council has sought additional advice from Worksafe and the EPA but that it had not been received at the time of writing.
346. I consider that it is reasonable to amend Clause 21.20 to reference the need to protect existing buffers of the LEMMP and to modify Plan 23 to remove any suggestion that medium density housing might be supported within the catchment of the C&CC
347. I agree with Council that it is premature to apply an ESO to the 1km buffer as part of Amendment C395.
348. Land immediately south of the LEMMP (for circa 820m) is located within a Farming Zone. The remaining 180m of land within the 1000m LEMMP buffer is included within the UGZ but cannot be developed for urban purposes until such time as a PSP is in place over the land.
349. The process of preparing a future precinct structure will enable further consideration of the most suitable zoning to apply to the entire land within the 1000m buffer, as well as any other planning provisions that might be needed to manage the hazard risk associated with the facility.

350. The risk of sensitive uses being permitted to establish within the 1km buffer in the intervening period is relatively low, given the zoning provisions that apply to the land.
351. Lastly, I note that the submitter has requested that N1.7.7 be amended to comply with Worksafe requirements, but it is unclear to me what is specifically meant by this request.

Impacts of the growth areas on adjacent farming operations:

352. I do not support the submitters request for an area of rural living to be designated on the northern and western boundaries of the NGGA. There are various ways that the interface between rural and urban land might be managed but requiring land that is designated for urban purposes to be developed to a rural living density is inconsistent with State planning policies relating to the efficient use of land designated for urban purposes.

Encroachment of the growth areas on the Anakie Extractive Industry Interest Area (EIIA):

353. The submission by DEDJTR notes that the Northern Geelong Growth Area encroaches into the Anakie Extractive Industry Interest Area (EIIA) and it recommends that a non-urban break be provided
354. In the land immediately outside the growth area boundary.
355. The land immediately outside the growth area boundary is zone for non-urban purposes and it is not identified in the Geelong Settlement Strategy for urban growth. In this sense, the land in question is already designated in the growth strategy and planning scheme for non-urban purposes.
356. Any future proposals to expand Geelong's settlement boundaries further would require an assessment of the environmental and natural resource constraints at that time, and the relevant policies relating to the protection of extractive industry interest areas would be applied at that time.
357. For these reasons I do not see any specific need to nominate non-urban break on the Framework Plan of Geelong Growth Strategy.

### 9.13. Utilities – gas pipeline

#### *Summary of submission:*

358. Submission from APA group, licensee for the high-pressure gas pipeline traversing the NGGA, raises issues including the location of sensitive uses, avoiding road construction across pipeline easements, requirement for a Safety Management Study (SMS) and revisions to Framework Plan wording.
359. A landowner submission requests reference to land uses within 570 metres of the pipeline in the Framework Plan be changed to land uses within 350 metres.

#### *My opinion:*

360. I am not qualified to comment on technical matters relating to the planning and management of high-pressure gas pipelines.
361. However, I note that the APA submission clarifies that it supports the outcomes of the preliminary Safety Management Study (SMS) which found that a distance of 350m from the gas easements is an acceptable area to exclude sensitive land uses within the Northern Growth Area, as opposed to the 570m measurement length referred to Plan 12 and Action 1.6.8. of the Framework Plan.
362. I understand the APA submission to mean that measurement length referred to Plan 12 and Action 1.6.8. of the Framework Plan could be revised from 570m to 350m. This understanding should be confirmed with the submitter.
363. The Council Officer response to this submission notes that the preliminary SMS for the Northern Geelong Growth identified the potential for activity centres to be located within 350 metres of the gas pipeline easement, and other community uses, such as pavilions associated with sports reserves, located within 65 metres of the easement.
364. I have not been provided with a copy of this report and I am unsure of its status although I note that both APA and Council appear to be relying on the same report.
365. The Framework Plan currently shows a town centre and parts of the walkable catchment of the C&CC within this measurement length. Whilst the Framework Plan is intended to be a broad conceptualisation of the future pattern of urban development, I suggest that the question of whether or not location of the town centre, the C&CC and pavilions associated with sporting reserved could potentially be located within the 350m measurement length be clarified to as to avoid any conflict in relation to this issue at the PSP stage.

#### 9.14. Utilities – electricity transmission lines

**Summary of submission:**

366. Two landowner submissions raise issues regarding the high voltage electricity transmission line easement along the north-western boundary of the NGGA. One landowner requests a portion of 980 Anakie Road not affected by the transmission line easement be added to the Urban Growth Zone. Another submission requests that the easement be included in the Urban Growth Zone to allow flexibility and a range of potential future scenarios including recreation uses within a linear park.

**My opinion:**

367. I support the use of land within the transmission line easements for urban-related uses.
368. There are precedents for land within transmission line easements being used for activities such as linear open space, hardstand areas associated with industry, etc. For example, in the case to the Mount Atkinson and Tarneit Plains precinct, the PSP provided for land within the transmission easement to be used for recreation, retail and industrial purposes. This was facilitated by rezoning the powerline easement to a special use zone and creating a schedule to the zone that allowed permits to be sought for such uses.
369. I consider that the question of what zone to apply to land within the powerline easements in the Northern and Western Growth Areas could either be resolved as part of current amendment process or during the preparation and approval of PSPs for the relevant land.

## 10. Issues Raised in Submissions – PSP Boundaries and Sequencing

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370. I have been asked to outline my opinion on the issues raised in submissions relating to proposed future precinct structure plan boundaries and sequencing.
371. The following is a summary of each of the main issues raised (as set out in the Council Officer report dated 24<sup>th</sup> September 2019) and my opinion in relation to them.

### 10.1. Precinct Boundaries

#### *Summary of submission:*

372. 12 submissions from landowners/developers request changes to individual precinct boundaries and timing within either growth area, as follows:

#### Changes requested in the NGGA:

- Allow Heales Road East precinct to be delivered in two stages, with some land identified as potential medium term rather than long term;
- Include 450 Elcho Road and land to the south in the Elcho Road East precinct (short term) rather than the Elcho Road West precinct (medium term);
- Two submissions request the GREP buffer within the Heales Road East precinct (long term) be identified in a short-term precinct.

#### Changes requested in the WGGA:

- Six submissions seek to include various land between the Moorabool River and Midland Highway in the Creamery Road precinct (short term) rather than the Batesford South precinct (long term);
- Include land between the Moorabool River and Midland Highway in the Batesford North precinct (medium term) rather than the Batesford South precinct (long term);
- Include land south of Church Street and east of Moorabool River in short term (Creamery Road) precinct or a new precinct rather than the Batesford South precinct (long term);
- Include land south of Church Street in a medium rather than long term precinct;
- Create a new precinct for the Moorabool River corridor;
- Create an additional Western precinct for land west of the Batesford Quarry; and
- Shift the eastern boundary of the McCanns Lane precinct eastward

#### *My opinion:*

373. There are no specific State government policies or guidelines on selecting the size or shape of a precinct that is intended to be subject to the preparation of PSPs.
374. The size and shape of any given PSP will vary depending on the local circumstances and needs. However, there are several State planning policies that should inform the nominated size and shape of a PSP. These include the following:

375. Supply of urban land - State policy seek to ensure that enough supply of land is available for residential, commercial, retail, industrial, recreational, institutional and other community uses. In the case of housing, State policy specifies that Planning Authorities should plan to accommodate projected population growth across their municipality over at least a 15-year period.
376. Ensuring that enough land is available to meet forecast demand also requires consideration of the local land market and the expected degree of competition within it. In circumstances where there are relatively few landowners (or conversely the land is heavily fragmented), there a potential that there may be insufficient competition in the market to ensure supply and affordability aspirations are realised. In such instances, it may be necessary to plan to accommodate growth for a longer time horizon as a means of ensuring a competitive local land market.
377. Preparing PSPs takes significant time and resources, and so a further factor in determining the size of a PSP is whether the size of the precinct enables the efficient use of planning resources and time in order to meet the 15-year land supply policy mandate. If a precinct is too small it may be an inefficient use of resource, whereas if a precinct is too large there may be so many issues to resolve that it can also become inefficient or even impractical to complete the Plan.

*Therefore, any given PSP needs to be of a size that can be prepared in an efficient and timely manner, as well as meaningfully contribute towards meeting the municipality's overall land supply needs.*

378. Sequencing of development and infrastructure delivery - State policy seeks to manage the sequence of development in areas of growth so that services are available from early in the life of new communities. It seeks to facilitate the coordinated and cost-efficient provision of local and regional infrastructure, and its priorities the planning for water supply, sewerage and drainage works in early planning for areas of growth.

*Therefore, any given PSP needs to be able to deliver the necessary infrastructure to support growth in a coordinated and cost-effective manner.*

379. Creating neighbourhoods – State policy support the preparation of structure plans that create neighbourhoods that contain a range of local activities for living, working and recreation.
380. In addition, the Framework Plans themselves have a strong focus on the creation of neighbourhoods where residents can live locally and sustainably.
381. The Framework Plans describe the creation of neighbourhoods in terms of neighbourhood design, amenity, sustainability, housing and social infrastructure. The neighbourhood design aspiration of the Plans includes the following:
- Creation of '20-minute neighbourhoods';
  - Prioritisation of walkability and cycling will be prioritised in the design of neighbourhoods, and;

- Creation of a unique sense of plan, character and identity based on the natural, landscape and physical context of the place.

382. In contrast to the Melbourne Growth Area Framework Plans, the Northern and Western Geelong Framework Plans do not empirically define what it considers to be the general size of a 'neighbourhood'. However, the plans do share the same aspiration to create definable neighbourhoods, and similar aspirations to deliver the basic building blocks of a neighbourhood (e.g. local activity centres, community centres, sports reserves, etc.) within walkable catchments.

383. I have commented elsewhere in my evidence that I consider that the Framework Plans could state more explicitly what it sees as being the essential ingredients of a 10 minute neighbourhood – this would ensure that greater importance is placed on designing and delivery the necessary building blocks within each walkable neighbourhood, as well as providing a stronger rationale for defining the size and shape of each PSP.

384. Irrespective of this, it is still evident that the Framework Plan has an underlying aspiration to create neighbourhoods that are large enough to support a walkable network of town centres, sports reserves and community facilities, etc. The number and placement of these various facilities in the Framework Plan is intended to support the creation of communities that are each generally in the range of 8000-15,000 people<sup>18</sup>.

*Therefore, the size and shape of any given PSP should be able to enable the creation of self-contained neighbourhoods that can satisfy State and local policy aspirations.*

*The boundaries of the PSP should also take account of natural and physical characteristics that can inform the identity of the neighbourhood or define its edges.*

385. In summary, it is my opinion that the size and shape of PSPs within each growth area should be informed by the following criteria where practicable:

- Be able to meaningfully contribute towards meeting the municipality's overall land supply needs.
- Be of a size and nature that can be prepared in an efficient and timely manner.
- Be able to deliver the necessary infrastructure to support growth in a coordinated and cost-effective manner.
- Enable the creation of relatively self-contained neighbourhoods that can satisfy State and local policy aspirations.

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<sup>18</sup> The exceptions to this are in the proposed Batesford South and Merriwap Road PSP areas, both of which are heavily constrained by floodplains, waterbodies and biodiversity. I make comment on the specific size and shape of each proposed PSP further in my evidence statement.

- Take account of the natural and physical characteristics that can define neighbourhood identity or define its edges.
386. There may well be some competing tensions amongst the above criteria in certain circumstances. For example, it may be the case that a large PSP is needed in order to address a forecast housing need, but this may bring with it some significant challenges in relation to the funding and delivery of infrastructure.
387. It is important in such cases that the likely costs and benefits of the size and shape of each PSP are considered before setting the relevant PSP boundary, so that the implication of any competing criteria can be properly identified and reconciled.
388. The tables overleaf provide a broad assessment of each of the Precincts identified in the Framework Plan. It is stressed that these are desktop assessments having regard to the information contained in the Framework Plans and the technical reports provided to me.
389. I have not attempted to evaluate the proposed precincts in relation to the infrastructure criteria as this is a matter that falls outside of my expertise, although I have made some comments in relation to this where relevant.

#### Elcho Road East

PSP Criteria	Satisfied?	Comment
Contribution towards municipal land supply.	Yes	The Framework Plan suggests that this precinct can accommodate circa 4,100 dwellings.
Able to be prepared in an efficient and timely manner.	Yes	Whilst there are various development challenges to be addressed in the precinct (such as dealing with the monocline and the high-pressure gas main) these are within the ordinary range of complexity for a growth area precinct.
Able to deliver infrastructure in a coordinated and cost-effective manner.	-	The precinct adjoins the Lara settlement, and has relatively direct access to existing roads and the Lara train station.
Enable the creation of self-contained neighbourhoods.	Yes	The precinct can accommodate a community of circa 11,600 residents, which is enough to support the delivery of a town centre and local community, recreation and health facilities within a relatively walkable catchment.
Takes account of characteristics that define neighbourhood identity and precinct edges.	Yes	The monocline and waterways will be the major landscape features within the precinct. Its north, east and south boundaries are defined by existing road reserves.

390. **Summary** – the proposed size and shape of this PSP satisfy the criteria above (subject to more detailed assessment of the infrastructure delivery criteria).

### Elcho Road West

PSP Criteria	Satisfied?	Comment
Contribution towards municipal land supply.	Yes	The Framework Plan suggests that this precinct can accommodate circa 4,000 dwellings.
Able to be prepared in an efficient and timely manner.	Yes	Whilst there are various development challenges to be addressed in the precinct (such as dealing with potential biodiversity issues, the high-pressure gas main and the LEMMP buffer) these are within the ordinary range of complexity for a growth area precinct.
Able to deliver infrastructure in a coordinated and cost-effective manner.	-	The precinct has less direct access to existing roads and infrastructure than Elcho Road East.
Enable the creation of self-contained neighbourhoods.	Yes	The precinct can accommodate a community of circa 11,000 residents, which is enough to support the delivery of a town centre and local community, recreation and health facilities within a relatively walkable catchment.
Takes account of characteristics that define neighbourhood identity and precinct edges.	Yes	The precinct does not have major landscape features within its boundaries. Its north and west boundaries are defined by an existing road reserve and powerline easement respectively.

391. **Summary** – the proposed size and shape of this PSP satisfy the criteria above (subject to more detailed assessment of the infrastructure delivery criteria).

### Heales Road West

PSP Criteria	Satisfied?	Comment
Contribution towards municipal land supply.	Yes	The Framework Plan suggests that this precinct can accommodate circa 5,200 dwellings.
Able to be prepared in an efficient and timely manner.	Yes	Whilst there are various development challenges to be addressed in the precinct (such as dealing with the high-pressure gas main, biodiversity and the monocline interface) these are within the ordinary range of complexity for a growth area precinct.
Able to deliver infrastructure in a coordinated and cost-effective manner.	-	The precinct has direct access to Anakie roads which provides a link into Geelong.
Enable the creation of self-contained neighbourhoods.	Yes	The precinct can accommodate a community of circa 14,500 residents, which is enough to support the delivery of potentially two town centres and a range of local community, recreation and health facilities within a relatively walkable catchment.
Takes account of characteristics that define neighbourhood identity and precinct edges.	Yes	The precinct does not have major landscape features within its boundaries. Its south and west boundaries are defined by an existing road reserve and powerline easement respectively.

392. **Summary** – the proposed size and shape of this PSP satisfy the criteria above (subject to more detailed assessment of the infrastructure delivery criteria).

## Heales Road East

PSP Criteria	Satisfied?	Comment
Contribution towards municipal land supply.	<b>Yes</b>	The Framework Plan suggests that this precinct can accommodate circa 3,800 dwellings.
Able to be prepared in an efficient and timely manner.	<b>Partially</b>	There are various development challenges to be addressed in the precinct (such as dealing with the high-pressure gas main, biodiversity and the monocline ridge, employment buffers and rural living interfaces). Determining whether to retain the existing rural living land or facilitate its long-term transition to urban residential and industrial uses will most likely take time to resolve.
Able to deliver infrastructure in a coordinated and cost-effective manner.	-	The precinct has direct access to Anakie and Bacchus Marsh roads which provides a link into Geelong and Lara
Enable the creation of self-contained neighbourhoods.	<b>Partially</b>	The precinct can ultimately accommodate a community of circa 10,600 residents, which is enough to support the delivery of the proposed town centre on its western boundary, as well as a range of local community, recreation and health facilities within a relatively walkable catchment. However, realising this yield is expected to only occur over the longer term as it requires the transition of large areas of rural living land to urban residential uses.
Takes account of characteristics that define neighbourhood identity and precinct edges.	<b>Yes</b>	The monocline and waterways will be the major landscape features within the precinct. Its south-east, south-west and east boundaries are defined by existing road reserves.

393. **Summary** – the proposed size and shape of this PSP generally satisfy the criteria above (subject to more detailed assessment of the infrastructure delivery criteria). However, the existing land use and fragmentation issues within this precinct suggest that it would be better for this land to be developed in the long term.

## Creamery Road

PSP Criteria	Satisfied?	Comment
Contribution towards municipal land supply.	<b>Yes</b>	The Framework Plan suggests that this precinct can accommodate circa 3,000 dwellings.
Able to be prepared in an efficient and timely manner.	<b>Yes</b>	There are relatively few development constraints to be addressed in the precinct, although there are some waterway and landform stability issues to address. These are within the ordinary range of complexity for a growth area precinct.
Able to deliver infrastructure in a coordinated and cost-effective manner.	-	The precinct is located close to the established community of Bell Post Hill, and it has direct access to the Midland Highway and the Geelong Ring Road. Its adjacency to the Geelong-Ballarat rail line presents some long-term public transport opportunities.
Enable the creation of self-contained neighbourhoods.	<b>Partially</b>	The precinct can ultimately accommodate a community of circa 8,500 residents. Whilst this population is too low to support a full range of services within the precinct boundaries, it is sufficient to support the delivery of two potential town centres on its western edges, and a certain level of local community, recreation and health facilities might be able to be delivered within a relatively walkable catchment within the PSP.
Takes account of characteristics that define neighbourhood identity and precinct edges.		The existing and constructed waterways will be the major landscape features within the precinct. The precinct is bound by existing roads to its west, south and east, and a rail line to its north.

394. **Summary** – the proposed size and shape of this PSP satisfy the criteria above (subject to more detailed assessment of the infrastructure delivery criteria).

### Batesford North

PSP Criteria	Satisfied?	Comment
Contribution towards municipal land supply.	Yes	The Framework Plan suggests that this precinct can accommodate circa 3,100 dwellings.
Able to be prepared in an efficient and timely manner.	Yes	Whilst there are various development challenges to be addressed in the precinct (such as dealing with existing rural living land uses, steeper landforms and flooding issues on the edges of the Moorabool River) these are within the ordinary range of complexity for a growth area precinct.
Able to deliver infrastructure in a coordinated and cost-effective manner.	-	The precinct has direct access to the Midland Highway and is close to the existing Batesford settlement. However, it is considerably further away from the infrastructure within the Geelong township than the creamery Road precinct.
Enable the creation of self-contained neighbourhoods.	Partially	The precinct can ultimately accommodate a community of circa 8,800 residents. Whilst this population is too low to support a full range of services within the precinct boundaries, it is sufficient to support the delivery of two potential town centres on its eastern edges, and a certain level of local community, recreation and health facilities might be able to be delivered within a relatively walkable catchment within the PSP. The precinct also has access to the existing Bell Park sports club.
Takes account of characteristics that define neighbourhood identity and precinct edges.	Yes	The Moorabool river floodplain and escarpment are the major landscape features within the precinct. The precinct is bound by existing roads to its south and east, and a rail line to its north.

395. **Summary** – the proposed size and shape of this PSP satisfy the criteria above (subject to more detailed assessment of the infrastructure delivery criteria).

## McCanns Lane

PSP Criteria	Satisfied?	Comment
Contribution towards municipal land supply.	Yes	The Framework Plan suggests that this precinct can accommodate circa 3,000 dwellings.
Able to be prepared in an efficient and timely manner.	Yes	There are relatively few development constraints to be addressed in the precinct, although there are some waterway issues to address. These are within the ordinary range of complexity for a growth area precinct.
Able to deliver infrastructure in a coordinated and cost-effective manner.	-	The precinct has direct access to the Hamilton Highway and is relatively close to the established suburbs of Highton and Herne Hill.
Enable the creation of self-contained neighbourhoods.	Yes	<p>The precinct can ultimately accommodate a community of circa 8,400 residents. Whilst this population is too low to support a full range of services within the precinct boundaries, its relatively central location within the southern part of the Western Geelong Growth Area means that it is intended to ultimately accommodate a sub-regional activity centre which will bring with it a range of employment and community service options. This activity centre will take many years to establish in its full form.</p> <p>A neighbourhood activity centre is also planned to adjoin the northern boundary of the precinct. A certain level of local community, recreation and health facilities might be able to be delivered within a relatively walkable catchment within the PSP.</p>
Takes account of characteristics that define neighbourhood identity and precinct edges.	Yes	The constructed waterway network will be the major landscape features within the precinct. The precinct is bound by existing roads to its south and west.

396. **Summary** – the proposed size and shape of this PSP satisfy the criteria above (subject to more detailed assessment of the infrastructure delivery criteria).

## Merrawarp Road

PSP Criteria	Satisfied?	Comment
Contribution towards municipal land supply.	<b>Partially</b>	The Framework Plan suggests that this precinct can accommodate circa 2,300 dwellings. This a relatively smaller lot yield than other precincts within the two growth areas
Able to be prepared in an efficient and timely manner.	<b>Yes</b>	A substantial portion of this precinct is encumbered by waterway and floodplain constraints associated with the Barwon River. Otherwise there are relatively few development constraints to be addressed in the precinct. These constraints are within the ordinary range of complexity for a growth area precinct.
Able to deliver infrastructure in a coordinated and cost-effective manner.	-	The precinct has direct access to the Hamilton Highway and is relatively close to the established suburbs of Highton and Herne Hill.
Enable the creation of self-contained neighbourhoods.	<b>No</b>	The precinct can ultimately accommodate a community of circa 6,400 residents. It is a relatively small and isolated urban precinct in comparison to other precincts.  Whilst this population is too low to support a full range of services within the precinct boundaries, it is located relatively close to the proposed regional activity centre and other likely community and recreation facilities in the McCanns Lane precinct.
Takes account of characteristics that define neighbourhood identity and precinct edges.	<b>Yes</b>	The Barwon River Floodplain will be the major landscape features within the precinct. The precinct is bound by the river to its south and existing roads to its south and west.

397. **Summary** – the proposed size and shape of this PSP satisfy the criteria above (subject to more detailed assessment of the infrastructure delivery criteria). However, the small size of the precinct mean that it is preferable that this land is developed once supporting infrastructure and services north of the Hamilton Highway are established.

## Batesford South

PSP Criteria	Satisfied?	Comment
Contribution towards municipal land supply.	<b>Yes</b>	The Framework Plan suggests that this precinct can accommodate circa 10,700 dwellings.
Able to be prepared in an efficient and timely manner.	<b>No</b>	<p>There are numerous development challenges to be addressed in the precinct. In addition to the need to remediate the Batesford Quarry, there are also challenges associated with the extensive steep escarpments along the Moorabool River that cover a substantial part of the eastern flank of the precinct, as well as potential landform stability issues associated with quarry overburden stockpiles. There is also a need to decide whether to convert agricultural land in the north-west part of the precinct to rural living uses, as well as resolving how various complex-shaped development parcels might be best be developed along the north and east edged of the precinct.</p> <p>The planning issues associated with this precinct are relatively more complex than in other precincts.</p>
Able to deliver infrastructure in a coordinated and cost-effective manner.	-	The scale and character of the precinct (with quarry pit and river as the most prominent features) mean that separate parcel of urban development is proposed in the north, east and west/south-west parts of the precinct. This pattern of urban development will create some complex servicing challenges and connecting services to all parts of the precinct will most likely be influenced by the design and timing of services delivered in adjoining precincts.
Enable the creation of self-contained neighbourhoods.	<b>Partially</b>	<p>The precinct can ultimately accommodate a community of circa 30,000 residents. However, the characteristics of the precinct mean that this will take the form of three separate parcel of urban development in the north, east and west/south-west parts of the precinct.</p> <p>The west/south west parcel has the largest development footprint and is more likely to be able to take on elements of a self-contained neighbourhood.</p> <p>The development parcels on the eastern part of the precinct will be more reliant on the Clever and creative corridor to provide walking, cycling and PT access to services along this linear corridor. A sophisticated urban design and delivery strategy will be needed to demonstrate how this can be realised.</p>
Takes account of characteristics that define neighbourhood identity and precinct edges.	<b>Yes</b>	The Quarry pit and Moorabool river floodplain and its escarpment is be the major landscape features within the precinct. The precinct is bound by existing roads to all its boundaries.

398. **Summary** – the proposed size and shape of this PSP partially satisfy the criteria above. It would be possible for this PSP to be split into two separate precincts but there are pros and cons associated with this option which I have addressed elsewhere in my evidence statement. In my view the

relatively complex land use matters to be resolved in this PSP suggest that it would be better for this land to be developed in the long term.

Response to submissions requesting changes to PSP boundaries:

399. The tables below outline my opinions in relation to the requested changes to PSP boundaries:

Changes requested in the NGGA:

Proposed boundary change	Support?	Comment
Allow Heales Road East precinct to be delivered in two stages, with some land identified as potential medium term rather than long term	<b>No</b>	<p>There is some land within the Heales Road precinct that could be developed ahead of the more fragmented rural living parcels.</p> <p>However, there is currently no evidence that additional land is needed in the medium term and retaining a mixture of larger and smaller lot development opportunities within the precinct is likely to create development impetus for the precinct in future.</p> <p>Splitting out the more readily development parcels may create challenges to facilitating the orderly development of this land in the long term.</p> <p>If there was a need to reconsider whether the more readily developable land out of the precinct in the future (based on land supply shortages or other factors) then this is a decision that could be made at that time and does not need to be made now.</p>
Include 450 Elcho Road and land to the south in the Elcho Road East precinct (short term) rather than the Elcho Road West precinct (medium term).	<b>No</b>	The size and shape of the Elcho Road east precinct satisfy the PSP criteria set out earlier in my evidence. I do not see any planning merit in including additional land into the precinct.
Two submissions request the GREP buffer within the Heales Road East precinct (long term) be identified in a short-term precinct.	<b>No</b>	The size and shape of the Elcho Road east precinct satisfy the PSP criteria set out earlier in my evidence. I also understand that there is enough industrial land available in the GREP precinct and elsewhere in Geelong in the short term and so there is no obvious need to bring industrial land on-line in the short term.

Changes requested in the WGGA:

Proposed boundary change	Support?	Comment
Six submissions seek to include various land between the Moorabool River and Midland Highway in the Creamery Road precinct (short term) rather than the Batesford South precinct (long term);	No	The Midland Highway forms a logical and substantial boundary between the Creamery Road and Batesford South precincts.  Including land south of the Midland Highway into the Creamery Road precinct will not assist with the criteria of creating self-contained neighbourhoods (the highway will be a significant barrier between these two communities) and it would introduce additional issues to be resolved in the PSP and reduce the ability for this plan be prepared in an efficient and timely manner.
Include land between the Moorabool River and Midland Highway in the Batesford North precinct (medium term) rather than the Batesford South precinct (long term); Include land between the Moorabool River and Midland Highway in the Batesford North precinct (medium term) rather than the Batesford South precinct (long term);	No	The Midland Highway forms a logical and substantial boundary between the Batesford North and Batesford South precincts.  Including land south of the Midland Highway into the Batesford North precinct will not assist with the criteria of creating self-contained neighbourhoods (the highway will be a significant barrier between these two communities) and it would introduce additional issues to be resolved in the PSP and reduce the ability for this plan be prepared in an efficient and timely manner.
Include land south of Church Street and east of Moorabool River in short term (Creamery Road) precinct or a new precinct rather than the Batesford South precinct (long term);	No	This land is a relatively isolated land parcel and planning for it should be undertaken in an orderly and coordinated manner as part of a larger precinct so that that the full range of outcomes described in State policy and the Framework Plan can be achieved. Preparing a PSP for this land in isolation from a wider PSP would only serve to further fragment the urban development in this location.
Include land south of Church Street in a medium rather than long term precinct;	No	Planning for the land south of Church street should be undertaken in an orderly and coordinated manner as part of a larger precinct so that that the full range of outcomes described in State policy and the Framework Plan can be achieved.  From a strategic planning perspective, there is some merit in adding this land area into the McCanns Lane precinct as it would increase the population size within it, which would in turn support the early delivery of the town centre and other infrastructure.  However, I understand that there are a number of significant transport and environmental issues that need resolution in this precinct, including planning for the protection and management of the Moorabool river corridor and resolution of road network issues with the State government (including vehicle connections over the Moorabool river and under the Ring Road to Church st).  These issues are likely to take some time to resolve and may potentially complicate completing the precinct planning for the McCanns Lane precinct. The risks associated with these

		complexities of delivering the planning of the adjoining precinct outweigh the potential benefits. I therefore consider that this land remain within the Batesford South (long term) PSP.
Create a new precinct for the Moorabool River corridor;	<b>No</b>	<p>Given the scale and complexity of the Batesford South precinct, there is some merit in potentially preparing two separate PSPs (south/west and north/east) for this area.</p> <p>However, here are numerous coordination issues that would need to be resolved in relation to the long term remediation and reuse of the quarry pit, and in any case it is my view that all land within this precinct would be developed in the long rather than medium term. It is therefore my view that the boundaries of the Batesford South PSP should remain unchanged.</p> <p>This is a matter that could be reviewed in future should the need arise to bring on part of this precinct earlier to meet emerging land supply constraints or for other reasons relating to the orderly and timely delivery of the land use outcomes shown for this land in the Framework Plan.</p>
Create an additional Western precinct for land west of the Batesford Quarry	<b>No</b>	Refer above.
Shift the eastern boundary of the McCanns Lane precinct eastward	<b>No</b>	Refer comments in relation to land south of Church Street.

## 10.2. Development Sequencing

### *Summary of submission:*

400. Seven submissions include reference to various development sequencing issues.
401. Issues raised include:
- General support for proposed development sequencing,
  - In the Clause 21.06-3 strategy to limit the number of PSPs that can be prepared simultaneously, change “limit” to “manage”;
  - Dependence on Lara West Growth Area for drainage and infrastructure connectivity;
  - Department of Transport advice to consider development sequencing considering transport network capacity; and
  - Request for landscape buffer to existing rural living lots ahead of development.

### *My opinion:*

402. I do not support the suggested changes to the wording of clause 21.06 from ‘limit’ to ‘manage’.
403. I support the underlying intent of Clauses 21.04 and 21.06 to ensure that land use and development proceeds in an orderly and coordinated sequence. I also noted that defining a preferred development sequences in growth area to better coordinate infrastructure planning and funding is explicitly supported by State planning policy<sup>19</sup>.
404. As noted earlier in my evidence statement, I consider that that the sequencing criteria set out in actions N5.2.1 and W5.2.1 should be included within the local policies within the planning scheme and amended to include consideration of some additional factors.
405. If the sequencing criteria were included within the planning scheme, then I do not consider it to be necessary for a specific order of PSP sequencing to be mandated by the planning scheme. Instead I suggest that the final decision on both PSP timing and precinct boundaries should be made by Council as a separate step, based on the analysis of need against the criteria included within the planning scheme.
406. Based on my current knowledge of the growth areas, I support the sequencing proposed in the Framework Plans. My general views regarding the logical sequencing of individual precincts within each growth area is as follows:

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<sup>19</sup> Clause 11.02-3S

North:

407. Elcho Road East should be developed first as it is relatively unencumbered by major constraints such as flooding, steep slopes etc. and it has the benefit of being able to create a community with close access to Lara West train station and town centre. I also understand that this area can be readily serviced (noting that the provision of utility infrastructure is a technical matter that is outside my area of expertise).
408. Either Elcho Road West or Heales Road should then be the medium-term priorities, as the former would be contiguous with the Elcho Road East precinct, and the latter is relatively free of constraint, has relatively straightforward access to services
409. Heales Road East should be the longer-term priority on the basis that it comprises large areas of fragmented rural living land holdings, and land designated for industrial purposes that is unlikely to be in demand for many years.

West:

410. The Creamery Road precinct has close access to the existing community at Bell Post Hill and I understand that this area can also be readily serviced (noting that the provision of utility infrastructure is a technical matter that is outside my area of expertise).
411. The next logical development stage would be Batesford North, which would be a contiguous extension of Creamery Road precinct.
412. Thereafter the southern precincts of McCanns Lane and Merrawarp could be initiated as these areas also have access to existing urban areas via the Hamilton Highway.
413. Leaving the Batesford South precinct to the long term enables the rehabilitation of the Quarry land to occur and for the range of other technical transport and environmental issues associated with this precinct to be resolved.
414. However, I would suggest that a more formal and detailed assessment of the relative merits of each precinct should be undertaken once a final set of PSP staging criteria has been agreed upon.
415. Lastly, I make the following in relation to other sequencing issues raised in submissions:
- I note transport an infrastructure issues raised in other submissions although I see no specific need to amend the Framework Plan or planning scheme provisions in response to them.
  - In relation to the issue of landscape buffers to rural lots, I note and support Councils response that the Framework Plan outlines the need for interface management between new neighbourhoods and adjoining rural living properties, and that the potential to apply landscape buffers will be considered at PSP stage.

Statement Prepared by:



Mark Woodland

6<sup>th</sup> November 2019

## Appendix 1 - CV

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## CURRICULUM VITAE

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**Address:**  
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**Date of Birth:**  
25<sup>th</sup> June 1970

**Nationality:**  
Australian

### Mark Woodland

#### Expertise:

- Strategic planning
- Development facilitation
- Project management & feasibility
- Structure planning
- Urban policy
- Stakeholder & Government relations
- Community consultation
- Media & communications.

#### Employment Overview:

**Director, Echelon Planning**  
(July 2012 –Present)

**Strategic Planning Director– Growth Areas Authority**  
(July 2010 – June 2012)

**New Business/Strategic Planning Manager – Delfin Lend Lease**  
(July 2007 – July 2010)

**Senior Planning Adviser - Minister for Planning**  
(February 2005 - June 2007)

**Manager, Strategic Planning - City of Melbourne**  
(September 2001 - January 2005)

**Manager, Investment Development - Hume City Council**  
(Jan 2001 - Aug 2001)

**Manager, Strategic Planning – City of Kingston**  
Sept 1997 - Dec 2000

**Urban & Environmental Planning Consultant - Gutteridge Haskins & Davey Pty Ltd**  
(Sept 1995 - Aug 1997)

**Urban Planner – Cities of Port Phillip, Boroondara and Camberwell**  
(1991 - 1995)

#### Qualifications:

- Bachelor Planning and Design 1990 - Melbourne University.
- Grad. Certificate, Business Administration. , 2000 - Monash School of Business.

#### Committee Memberships:

- Property Council of Australia – current member of the Residential Developers Committee
- Victorian Planning & Environmental Law Association

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Curriculum Vitae for Mark Woodland

