

Date: 12 November 2019

City of Greater Geelong Planning Scheme Amendment C395

Opening Submission on behalf of the City of Greater Geelong

Planning Panels Victoria

INTRODUCTION

1. This opening Part B submission is made on behalf of Greater Geelong City Council (**Council**). Council is the Planning Authority for Amendment C395 (**Amendment**) to the Greater Geelong Planning Scheme (**Planning Scheme**).
2. The Amendment proposes to implement the City of Greater Geelong Settlement Strategy October 2018 (**the Settlement Strategy**) and the Northern and Western Geelong Growth Areas Framework Plan March 2019 (**the Framework Plan**) into the Planning Scheme.
3. This opening submission is to be read in conjunction with the Part A submission and will be supplemented with Council's substantive Part B submission, which will be presented following the evidence called by Council. Council's Part B submission will respond to the matters raised in direction 25 of the Panel's directions dated 18 October 2019, namely:
 - a. *a summary of the key issues raised in submissions, including requests for individual changes to amendment*
 - b. *its response to evidence*
 - c. *any further changes Council proposes to make to the Amendment in response to expert evidence or submissions.*
 - d. *an explanation to the interrelationship with the declaration of the Bellarine Peninsula region as a Distinctive Areas and Landscape*
 - e. *its final position on the Amendment.*
4. To assist the parties with the independent planning evidence to be called by Council, Appendix A to this submission contains a limited response to evidence being Council's position on the evidence of Mr Barlow and Mr Woodland.
5. In support of its submissions, Council relies on the expert evidence of:
 - 5.1. Mr John Collins of Spatial Economics in respect of planning (Settlement Strategy);
 - 5.2. Mr Michael Barlow of Urbis in respect of planning (Settlement Strategy);
 - 5.3. Mr Mark Woodland of Echelon Planning in respect of planning (Framework Plan);

- 5.4. Mr Dale Stokes of Spatial Economics in respect of lot supply;
- 5.5. Mr Jeremy Reynolds of Spatial Economics in respect of demographics and population; and
- 5.6. Mr Reece Humphreys of GTA in respect of transport.

THE CONTEXT

6. Greater Geelong is an attractive place to live. It has lifestyle and housing advantages arising from proximity to the coast, recreational choices and employment options. It boasts significant coastal, rural and wetland landscapes and environments.
7. The municipality contains 6 of the top 42 places within Victoria by population¹:
 - 7.1. Geelong (2)
 - 7.2. Ocean Grove Barwon Heads (13)
 - 7.3. Lara (21)
 - 7.4. Drysdale Clifton Springs (24)
 - 7.5. Leopold (27)
 - 7.6. Portarlington St Leonards (42)
8. Greater Geelong has the 10th highest level of building approvals in the last year, nationwide.²
9. Through the Amendment Council seeks to provide for the challenge presented by this growth while balancing the continued and renowned liveability. The Settlement Strategy and the Framework Plan, together with the accompanying Amendment are designed to achieve the following strategically justified outcomes:
 - 9.1. Providing clear direction for the location of future residential development;
 - 9.2. Planning of the Northern and Western Geelong Growth Areas for future development, including the timely provision of infrastructure;

¹ 2016 ABS data.

²<https://blog.id.com.au/2019/housing-analysis/map-where-are-the-hotspots-for-residential-development-in-australia/> with Wyndham and Casey the other Victorian places listed.

- 9.3. Support increasing urban consolidation of existing areas;
 - 9.4. Ensuring a diversity of housing is provided;
 - 9.5. Protecting and enhancing significant landscapes and environments; and
 - 9.6. Maintain the unique values of the Bellarine Peninsula and containing growth within existing townships in accordance with approved structure plans.
10. The Amendment is underpinned by extensive and thorough background reports and analysis. Community and stakeholder consultation has occurred at multiple points during the development of the documents the Amendment is seeking to implement.
11. The Settlement Strategy and the Framework Plan provide a sound framework to manage land use and development within the Geelong municipality. This is critical to ensure proper and orderly planning of housing growth in this beautiful part of Victoria is properly managed.

THE PLANNING OF GEELONG

12. The City of Geelong accommodates a mix of urban, coastal and rural areas. Its valued assets include the Bellarine Peninsula, the You Yangs Regional Park, Geelong Waterfront, beaches, wetlands and parklands. It is the gateway to the Great Ocean Road but also accessible to greater Melbourne. It offers residents a high-quality lifestyle with good access to jobs and services.
13. The City of Geelong has a history of strong strategic planning which has sought to protect these valued characteristics and desirable lifestyles while accommodating growth.
14. Since the 1988 Geelong Regional Development Strategy, planning policy has directed growth to urban Geelong and designated towns on the Bellarine Peninsula and sought to limit growth outside of these areas to protect the significant landscapes, environmental values and agricultural areas.

15. Broadly, these objectives remained in the 1996 City of Greater Geelong Urban Growth Strategy. The key strategic directions of this strategy directed growth to designated townships, sought consolidation within urban Geelong and directed future growth to Armstrong Creek growth area.
16. The Geelong Region Plan 2007 provided a regional response to managing growth within the municipalities of the City of Greater Geelong and the Shires of Surf Coast, Colac-Otway and Golden Plains. This Plan concluded that most of the anticipated population growth up until 2051 could be accommodated within the areas already strategically designated or identified for growth.
17. The urban consolidation objectives in these strategies were furthered in the Greater Geelong Housing Diversity Strategy 2007 which identified the advantages of providing a diversity of housing types and densities within existing urban areas. It also identified 'Key Development Areas'³ and 'Housing Diversity' areas based around activity centres and public transport nodes.
18. In 2013, the G21 Regional Growth Plan was released. It provided, and continues to provide, regional direction for accommodating future growth in the City of Greater Geelong and the Shires of Surf Coast, Colac-Otway and Golden Plains. Most relevantly, the G21 Regional Growth Plan identified two 'Further Investigation Areas' to the north and west of the Geelong Ring Road for potential development beyond the planned growth. These areas were only identified as longer-term options for expansion of a regional population of beyond 500,000.
19. At state level, Plan Melbourne 2017-2050 identifies Greater Geelong as a regional city and directs investment in regional Victoria which supports housing and economic growth.⁴ The Plan Melbourne Implementation Plan includes an initiative to grow Geelong as Victoria's second city.⁵
20. In recognition of the landscape and environmental significance of the Bellarine Peninsula, the Bellarine Peninsula Localised Planning Statement was implemented into

³ Central Geelong, West Fyans, Waurun Ponds, Armstrong Creek Growth area and other designated precincts.

⁴ Direction 7.1.

⁵ Page 33.

the Planning Scheme. This statement recognises the area as a valued area with significant geographic and physical assets. It sets out the long-term planning policies and priorities for the region. These priorities include protecting the rural and coastal environment, maintaining non-urban breaks between settlements, supporting ongoing agricultural land use and facilitating growth into existing settlements consistent with adopted structure plans.

21. The strategic planning for Greater Geelong has adopted consistent directions in relation to growth. These directions comprise:
 - 21.1. Consolidation in existing settlements.
 - 21.2. Major growth directed to existing Key Development Areas and designated growth areas.
 - 21.3. Protection of significant landscapes and environments.
 - 21.4. Maintenance of non-urban breaks between townships within the municipality and between Geelong and Melbourne and Geelong and the Surf Coast.
 - 21.5. Protection of agricultural land.

WHERE IS GEELONG NOW?

22. Geelong is Victoria's second largest city and is one of the fastest growing regional cities.
23. The current Planning Scheme provides that there is a need to accommodate an additional 63,000 people in approximately 41,000 new dwellings between 2006 and 2031.⁶ It also recognises the municipality has an ageing population and a trend to smaller households demanding smaller dwelling types.
24. Key policy objectives and strategies related to accommodating this growth:
 - 24.1. direct growth to infill established areas and designated growth areas, such as Armstrong Creek;⁷

⁶ Clause 21.06-1.

⁷ Clauses 21.06-2 and 21.06-3.

- 24.2. seek to improve housing affordability through maintaining a diverse range of well-located housing stock and maintenance of appropriate land supply;⁸
- 24.3. encourage urban consolidation in Key Development Areas at medium and high densities, in Increased Housing Diversity Areas at a range of densities depending on location and zoning and in the Mixed Use Zone;⁹
- 24.4. seek to maintain non-urban breaks;¹⁰
- 24.5. seek to limit rural living development to existing land zoned for this purpose;¹¹ and
- 24.6. seek to ensure that new neighbourhoods provide a diverse range of housing for all household types.¹²

WHAT GROWTH IS ANTICIPATED?

- 25. The current population estimates in the Planning Scheme are based on housing and settlement strategies that are over 10 years old.
- 26. Since these estimates, the population growth in Geelong has substantially increased. In the last 5 years,¹³ the City of Geelong's population has increased from 216,000 to 239,000 and its growth rate has increased from 1.5 per cent to 2.7 per cent. Based on a 2.5 per cent growth rate, the municipality can expect an additional 152,000 people by 2036. There has also been a trend towards smaller household sizes and an ageing population.
- 27. This growth and population profile change is expected to be sustained.

⁸ Clauses 21.06-2.

⁹ Clause 21.06-3.

¹⁰ Clause 21.06-2.

¹¹ Ibid.

¹² Ibid.

¹³ Between 2011 and 2016.

28. The Victoria in Future (VIF) 2019 projections and i.d. Consulting 2019 projections for the City of Greater Geelong both project significant population, household and dwelling increases over the next 15-25 years.
29. The VIF projections estimate a population increase of 120,720 between 2016 and 2036 with a total population of 360,250 in 2036. This is based on an annual growth rate of 2 per cent between 2018 and 2036. The number of dwellings is projected to increase by 121,160 to 165,020 in 2036. This is based on an annual growth rate of 2.2 per cent.
30. The i.d. Consulting forecasts an additional 153,685 people between 2016-41 with a total population of 361,014 in 2036 and 393,216 in 2041. This is based on an annual growth rate of 2 per cent. The number of dwellings projected in 2036 is 161,978 and 176,622. This is an increase of almost 70,000 dwellings between 2016 and 2041 based on an annual growth rate of 2 per cent.
31. This projected growth necessitates an update to Council's settlement and housing policy.

THE SETTLEMENT STRATEGY

32. The Settlement Strategy is based on a sound foundation of strategic work and enunciates clear and defensible directions for accommodating and managing the future growth of the municipality.
33. The Settlement Strategy guides future housing growth until 2036 (and beyond) in a manner that protects the unique character and important values of the municipality. It contains an overview of current housing policies, an analysis of population trends and recommendations to provide housing for Geelong's growing population while preserving significant environments.

Development of the Settlement Strategy

34. Council's housing and settlement strategies have been developed over a period of time, as set out above. The strong level of growth in recent times created the impetus to develop the strategy.

35. The strategic work which informed the Settlement Strategy involved:
 - 35.1. analysing housing, development and population data;
 - 35.2. reviewing the current planning framework; and
 - 35.3. consulting with the housing development industry, government agencies, servicing authorities and the Greater Geelong community.

The vision and content of the Settlement Strategy

36. In essence, the Settlement Strategy:
 - 36.1. ensures there is an adequate supply of residential land, including ongoing monitoring to allow yield estimates to be adjusted as more detailed planning proceeds;
 - 36.2. directs major growth to the Northern and Western Growth Areas, Armstrong Creek and key infill sites;
 - 36.3. encourages urban consolidation with a target of 50% of housing to be provided existing urban areas for infill development;
 - 36.4. contains growth within the existing settlements on the Bellarine Peninsula and maintain the significant landscape character of this area;
 - 36.5. encourages the provisions of a diversity of housing types.

Planning for 15 years of land supply

37. Clause 11.02-1S states:

'Plan to accommodate projected population growth over at least a 15 year period and provide clear direction on locations where growth should occur. Residential land supply will be considered on a municipal basis, rather than a town-by-town basis.'

38. Growth includes both that derived from urban consolidation and broad acre growth.

39. The Settlement Strategy is premised on this foundation principle. Mr Collins, who will be providing evidence to the Panel, was in part responsible for the creation of this policy at a State level. The policy is premised on a municipal wide basis and the Settlement Strategy and Amendment responds to this achieving growth that would on a strong growth basis accommodate growth until 2045.¹⁴ Should Geelong revert to simply strong growth on average of 2% (proximate to VIF figures) the planned growth accommodated by the Amendment would last well in excess of 15 years from the end point of the Settlement Strategy at 2036.¹⁵

40. Council submits this is a conservative figure as it assumes that 75% of all growth to be derived from broad hectare development. In this way, the estimates are premised upon Council's own policies of 50% infill falling short.

41. It is relevant to consider existing policies which render this a conservative measure. Council's Activity Centre zone is divided into 7 precincts. Of those precincts, Precinct 2: Commercial living and medical, Precinct 5 the Inner Western Wedge, Precinct 6 the Station Precinct and Precinct 7 Mercer Street all include accommodation uses.

42. The Activity Centre Zone was introduced in 2014 and with the developing maturity of the Geelong residential market is bringing change. The Mercer at 53 Mercer Street is delivering approximately 120 dwellings and the Mirimar at 18-20 Cavendish Street is delivering approximately 110 dwellings. A long-term planning legacy site at Balmoral quay is delivering 100 townhouses.

¹⁴ Expert Witness Statement of Dale Stokes, page 20.

¹⁵ Expert Witness Statement of Dale Stokes, page 20.

43. The Part A¹⁶ highlights the 12,000 future residents to be accommodated at Moolap pursuant to the recent State Government Moolap Strategy.
44. The Amendment comfortably responds to the accepted standard to delivery of residential land.

Urban Geelong

45. The role of urban consolidation in increasing housing supply is well-recognised. The Settlement Strategy:
 - 45.1. supports accommodating 10,000 people in central Geelong by 2026;
 - 45.2. seeks to facilitate infill development to increase its housing supply contribution to 50 per cent by 2047;
 - 45.3. advocates identification of preferred locations for increased housing density; and
 - 45.4. seeks to maximise a diverse range of housing, especially in activity centres in Increased Housing Diversity Areas.
46. This approach has the urban consolidation advantages of making good use of existing infrastructure, achieving 20 minute neighbourhoods, providing economic support of existing centres and increasing housing choice in well-located areas.

The appropriate rate of population growth

47. As set out in the background reports prepared by Spatial Economics, a scenario-based approach to the population projections for the Settlement Strategy was adopted. Projections were prepared for five growth scenarios:
 - 47.1. Long term scenario – the average annual growth rate between 1991 and 2016 of 1.3 per cent.
 - 47.2. Current VIF and i.d. Consulting projected growth rate scenario – 1.6 per cent per annum.
 - 47.3. Strong growth scenario – 2.0 per cent per annum (based on the most recent data available before preparing the Settlement Strategy);

¹⁶ At Paragraph 78.

- 47.4. Aspirational growth scenario – 2.5 per cent per annum (based on trend towards higher annual growth rates and consistent with the growth rate in the G21 Regional Growth Plan); and
- 47.5. Growth surge scenario – 3 per cent per annum (based on recent figures which show growth over 2.5 per cent).
48. The Settlement Strategy adopts the aspirational growth rate of 2.5 per cent. This rate is higher than the VIF and i.d. Consulting rates of 2 and 2.1 per cent because it takes into account the higher than expected growth rates between 2011 and 2016. No area in regional Victoria has achieved the 3 per cent rate. Even the extraordinary growth recently in Geelong has been at 2.7 per cent.
49. There is the ability to adjust this adopted rate should monitoring indicate actual rates are higher or lower. So even if the growth rate surges over 2.5 per cent, the Settlement Strategy includes a ‘buffer’ for any upturn in demand based on a 3 per cent growth rate. The supply and demand of housing will be regularly monitored by Council to allow for any necessary adjustments.
50. This is cautious and prudent planning.

Just because land is developable, does not mean land should or need be developed

51. Council has a duty (amongst others) under the *Planning and Environment Act 1987* to:
- provide sound, strategic and co-ordinated planning of the use and development of land in its area;*¹⁷
52. A lot of land can be potentially developed irrespective of whether it is currently put to good use, is preferentially located, is well serviced. If all developable land within Greater Geelong were developed then most of the municipality would be housing (presuming people still wished to reside here once the essential characteristics of the place were eroded).

¹⁷ Section 12(1)(b).

53. The proper exercise of the duties of a Planning Authority include making choices about directing growth to appropriate locations. 'Appropriate' is multi-faceted. It includes need – for example whether land is needed to meet the delivery of 15 years of supply. It includes infrastructure, servicing infrastructure, orderly delivery of growth, location relative to jobs, availability, ownership and the list could go on.
54. For a period of time, a lack of supply in urban Geelong and surrounds meant that existing demand for these areas was met largely through the Bellarine.¹⁸
55. This Planning Authority has made choices about the location of future growth. This must necessarily occur to discharge its duty. The Amendment relies upon growth areas identified in strategy, the G21 Plan, the existing growth area Armstrong Creek and the summation of its program of existing local structure planning. The newly proposed Northern and Western Growth Areas respond to the factors outline above.

Council proposes a program of reviews that will permit adjustment over time as necessary

56. The Settlement Strategy is a long term strategy and, appropriately is premised on a process of reviews over its life. Pages 86-88 of the Settlement Strategy describe the proposed reviews. Mr Collins in his evidence calls for a mid-implementation review.¹⁹ This includes an objective to 'update the growth scenarios at least every 5 years' and to update the Settlement Strategy accordingly.
57. Even on the most ambitious growth of 3% there is available housing for the life the Settlement Strategy but there would be a need to 'line up' the next growth fronts to satisfy the whole of the 15 year buffer. Such is the period of the strategy that were this to become apparent in 2028, there would still be another 8 years during which to sure up the land supply. The robust assumptions underpinning the strategy mean that the land supply can be effectively met.
58. The range of submissions suggest that the market (at least) considers further opportunities exist beyond the land already identified in this strategy.

¹⁸ Expert Witness Statement of John Collins, page 14.

¹⁹ Expert Witness Statement of John Collins, pages 15 and 16.

The Bellarine Peninsula

59. The Bellarine Peninsula is an area of high environmental and landscape value. Its importance is recognised in clause 21.14 of the Planning Scheme, the G21 Regional Growth Plan, the Localised Planning Statement²⁰ and, more recently, the declaration of the Bellarine Peninsula as a Distinctive Area and Landscape under the Planning and Environment Act 1987. It is also an area of primary production and tourism.
60. Planning on the Bellarine has been guided by a series a structure plans and structure plan reviews conducted by Council over time. These are described in the Part A submission.²¹
61. The Localised Planning Statement speaks to the planning tensions in this area:²²

Overview of area

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The Bellarine Peninsula retains unique, high quality rural landscapes associated with extensive areas of cropping and grazing, viticulture and horticulture. The area plays an important role, being highly valued for its scenic attributes, open rural landscapes, proximity to the coast and surf beaches, tourism role and lifestyle appeal. It has key relationships with Central Geelong, the Surfcoast and Great Ocean Road, as well as providing an important ferry link to the Mornington Peninsula from Queenscliff.

The environment on the Bellarine Peninsula is one of the key reasons people are attracted to it, with its strong farmed landscape character between settlements. It also includes significant coasts and environmental landscapes, beaches and waterways, some of international significance. This character is extremely important and highly valued by the local community. Climate change presents challenges for the Bellarine Peninsula. Erosion, inundation and storm surge are already impacting low lying coastlines around the Bellarine Peninsula. These impacts are projected to increase and combined with other projected changes like increases in average temperatures and changes in rainfall patterns, will have implications for agriculture and land use in the area. To help address this, councils, state government and other land management

²⁰ A reference Document at Clause 11.

²¹ At Paragraph 63 on Page 25.

²² Extract from Page 2.

partners are working to ensure better understanding of climate change risks and impacts, such as sea level rise, for the Bellarine Peninsula.

The Borough of Queenscliffe is an important area of high conservation value both for its historical built form and environmental significance. Waters around Point Lonsdale and Swan Bay form part of the Port Phillip Heads Marine National Park. In addition to this, Swan Bay is protected by international migratory bird treaties and identified as part of the broader Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar site. The conservation of these attributes are important, particularly in relation to the Borough's significance as a major tourist attraction and its proximity to the Great Ocean Road tourist route.

The townships of Drysdale/Clifton Springs, Leopold and Ocean Grove are identified in the G21 Regional Growth Plan as designated growth areas and play a key role as district towns providing services and facilities to the growing population and surrounding rural areas. Many of the towns offer coastal recreation, food and wine experiences and holiday accommodation. Typically they experience significant population peaks and pressure on infrastructure over key holiday periods. Retail and hospitality businesses generate significant employment on the Bellarine Peninsula and rely heavily on tourism and dual residents to survive. Structure Plans have defined clear settlement boundaries for townships which enable protection of the rural and coastal landscapes.

Forecast growth in the region, its adjoining regions and Melbourne, when combined with increased tourism and recreational visitation, will place additional pressure on the natural assets of the Bellarine Peninsula. As the area grows it is important that these characteristics are upheld by continuing to maintain key coastal landscapes and agricultural production in rural areas.

62. The Settlement Strategy seeks to '*maintain the unique township, landscape, tourism, farming and environmental values of the Bellarine Peninsula*'. Directions to achieve this principle are:
- a. *Recognise that Drysdale/Clifton Springs, Leopold and Ocean Grove are fulfilling their roles as district towns.*
 - b. *Discontinue the use of the term 'growth area' in favour of 'district town'.*
 - c. *Acknowledge the share of housing development going to the Bellarine Peninsula should decrease over time.*
 - d. *Review housing opportunities within townships to determine if further localised housing intensification can be achieved.*

e. *Ensure development reflects the preferred character of the townships.*²³

63. The Settlement Strategy recognises that some townships can accommodate further growth within the existing structure plans. Equally, it recognises that the proportionate contribution of the Bellarine to growth will diminish over time in order to protect the valued environmental and landscape assets of the Bellarine, including the inter-urban breaks and unique identity of individual townships.
64. These changes are reflected in the Amendment under Clause 21.06-2:
- 64.1. Direct the majority of new housing growth to urban Geelong (urban infill, Armstrong Creek and the Northern and Western Geelong Growth Areas).
- 64.2. Reduce the share of new housing development on the Bellarine Peninsula.
- 64.3. Protect the distinct landscape areas of the Bellarine Peninsula and the You Yang Precinct from urban encroachment.
65. At the same time the Amendment does not alter the existing localised planning for the major towns of the Bellarine peninsula save for the district towns no longer being referred to as growth areas.
66. Localised planning for the Bellarine is contained within Clause 21.14 of the Planning Scheme. The Clause provides direction within the existing planning areas and policy for 'Implementation' at Clause 21.14-4. For example, a number of submissions to the Amendment concern Ocean Grove. The Ocean Grove section of Clause 21.14 of the Planning Scheme states:

Review the Structure Plan including an assessment of long term growth options (both infill and settlement expansion) for Ocean Grove by no later than 2021. The assessment should include consideration of:

- *land to the north, north-west and east of Ocean Grove.*
- *the role of Ocean Grove as a district town.*
- *other planned growth on the Bellarine Peninsula.*
- *development trends, lot supply and housing capacity within the settlement boundary.*
- *the desirability of providing a diversity of living options.*

²³ The Settlement Strategy, p. 74.

- *physical and environmental constraints, including the importance of protecting the biodiversity values of the Nature Reserve and maintaining a rural break between settlements.*
- *the protection of landscape values and implications for the character of approaches to Ocean Grove township along the Bellarine Highway, Grubb Road and Wallington Road.*
- *the implications for significant agricultural uses and their employment generating potential.*
- *whether any adjustments to the settlement boundary are required*

67. These elements of the planning framework are not proposed to directly change under the Amendment. In this respect at least the Amendment reflects a status quo position of specific settlement boundaries planning within the Bellarine.

68. At the time the Settlement Strategy was prepared the Distinctive Areas and Landscapes legislation was in the form of a Bill and was recognised as a matter for investigation.²⁴ On 22 October 2019 the Bellarine was declared a Distinctive Area and Landscape (DAL). Prior to the declaration Council had sought clarification from DELWP regarding the process and at the time of the Part A had received a letter from DELWP attached at Appendix 5 to the Part A. Council has also reviewed the publicly available 'Frequently Asked Questions'.²⁵ It is apparent from the DELWP letter and the FAQs that:

68.1. The Department is commissioning (at least) landscape and township character assessments of towns on the Bellarine.

68.2. Protected Settlement Boundaries are under consideration. Such assessment will utilise the work Council has previously completed:

*'Current township structure plans that have been through public exhibition and independent review will be used as basis to inform protected settlement boundaries, along with the results of public engagement and any relevant recommendations from technical assessments currently being prepared.'*²⁶

²⁴ Settlement Strategy, page 9.

²⁵https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.vic-engage.files/7915/7224/1891/Frequently_Asked_Questions_-_Bellarine_Peninsula_Declaration_Final.pdf

(identified with a draft watermark but entitled 'Final').

²⁶ Page 3, FAQs.

- 68.3. The DAL process will be subject to a further two phases of public consultation and Council will be consulted on this process.
69. Under the statutory regime presented within the Part A, upon completion of a Statement of Planning Policy through the DAL process there will be an amendment to the Planning Scheme to give effect to the Statement of Planning Policy.
70. It can be seen that while the Amendment engages with the Bellarine at a broader strategic level it does not seek to effect localised change to township boundaries or relevant localised Planning Scheme provisions.
71. Council considers that the DAL process is the proper forum for consideration of specific planning policy on the Bellarine and anticipates that it is through this process that the some or all of the matters of Implementation under Clause 21.14 of the Planning Scheme will be satisfied and addressed. It considers the DAL process for the Bellarine will resolve both these matters and will satisfy the 'logical inclusions' identified within the Amendment in so far as it relates to the Bellarine.

Logical inclusions

72. Under proposed Clause 21.06 the Amendment includes the following text under Further Work:
- Establish a consultation process to deal with any significant anomalies or logical inclusions as part of conferring an enduring settlement boundary.*
73. On the basis that the Settlement Strategy, except for the Northern and Western Growth Areas, does not identify new areas of growth, the Amendment includes a proposed process by which minor logical adjustments or omissions can be addressed.
74. Council proposed that this will occur pursuant to a separate Planning Scheme Amendment process to be initiated in the short term after gazettal of the Amendment. It is proposed that this process be based upon the following principles:
- 74.1. Bellarine township boundaries to be determined by the DAL process.
- 74.2. Geelong will upon gazettal of the Amendment have an adequate land supply.

- 74.3. Geelong is committed to delivering sustainable and functional communities in a timely manner to the existing identified growth areas and does not need to identify further additional growth fronts at this time.
 - 74.4. Adequacy of supply will be identified during the ongoing monitoring and review.
 - 74.5. Geelong is committed to achieving 50 percent of housing via infill by 2047 and providing greater densities and housing diversity in identified growth areas.
75. Council planning for this logical inclusions process has identified the following broad principles at this time. While the precise nature of the principles may alter with the institution of the process the principles reflect current thinking and understanding.
- 75.1. Land supply is not a consideration.
 - 75.2. Land must be contiguous with urban residential areas – GRZ, RGZ, NRZ or UGZ.
 - 75.3. It is unlikely that the Northern and Western Growth Areas would be included given they have recently been the subject of a specific investigation process.
 - 75.4. Land must deliver a benefit to existing or identified residential land/development through for example more efficient infrastructure provision or utilisation.
 - 75.5. Land must be able to rely on existing facilities and services and not create the need for additional or new community infrastructure or significant council investment that would be required for a new residential node.
76. The suitability for urban development should consider:
- 76.1. flooding risks, climate change, environmental issues including acid sulphate soils;
 - 76.2. accessibility, including the feasibility and cost of providing adequate public transport and roads access;
 - 76.3. impacts of any proposed boundary changes on the economic provision of other development fronts;
 - 76.4. urban services including both utility and community services.
 - 76.5. impacts of any proposed changes on the establishment of logical and enduring settlement boundaries;
 - 76.6. physical boundaries including consideration of natural features, location of major roads and reservations for public utilities; and
 - 76.7. potential impacts on significant existing non-urban land uses and activities including agricultural, activities, extractive industry, sensitive land use buffers, tourism and other established and valued land uses.

77. While precise timing is not finalised as the commencement of the process is dependent upon the successful implementation of C395, assuming a C395 implemented by mid-2020:
 - 77.1. Commence a Planning Scheme Amendment to determine the long-term boundary for urban Geelong via a logical inclusions process. (mid 2020);
 - 77.2. Based on Settlement Strategy submissions and other key considerations Council officers will prepare a draft 'long-term' or 'permanent' boundary to replace the 'indicative' boundary approved under C395. This will include the final methodology and criteria used to come to Council's preferred position. (mid 2020).
 - 77.3. Council will complete any supporting strategic work.
 - 77.4. The report and draft boundary will go out on public exhibition as per the usual amendment process (mid-late 2020).
 - 77.5. Submissions will need to meet and address the criteria as part of any proposal for land to be included (late 2020) .
 - 77.6. Council will consider the submissions and refer to Independent Panel, if required (mid-late 2020).
 - 77.7. Consideration of Panel report and final adoption of long term boundary (mid-late 2021).
 - 77.8. Long term boundary introduced into the Planning Scheme (2022).

THE FRAMEWORK PLAN

78. The Framework Plan is innovative, ambitious and worthy of strategic support.
79. It contains overarching principles for land use and development of the Northern and Western Geelong Growth Areas. The nine precincts within these two areas will have the capacity to accommodate 110,000 new residents.
80. The Framework plan builds upon the metropolitan precinct structure planning experience and seeks to improve that outcome through initiatives such as the Clever and Creative Corridor.

Development of the Framework Plan

81. The genesis of the Framework Plan was when these two areas were identified as 'Further Investigation Areas' for long term growth in the G21 Regional Growth Plan 2013. Although these areas were identified for long term growth, the current growth rates necessitate the development of these areas before 2025.²⁷

82. The G21 Regional Growth Plan states²⁸:

Potential development of these areas, is not likely to be required ahead of identified planned growth. They will require further assessment of suitability and capacity for growth and the monitoring of land supply within the region to determine timing. The Lovely Banks area near Lara potentially has a higher priority, given greater connection to Melbourne and links with proposed national transport logistics employment areas.

83. However the G21 Regional Growth Plan also notes the potential variability in land supply and demand²⁹:

These areas will support the capacity of the region to accommodate population growth beyond 500,000 and have been identified because of:

- *the complexity of the region's housing market and the ability of planned developments to secure the necessary infrastructure and meet intended lot yield and the needs of the market*
- *the difficulty of predicting the actual growth rate.*
- *Future growth rates are anticipated to be between 1.5% and 2.5% over the life of the Growth Plan. A higher growth rate of 2.5% could result in the need to develop these Further Investigation Areas earlier than anticipated to ensure the right mix of housing supply and choice. This reinforces the need to monitor land supply*
- *the opportunity to provide a competitive house and land market*
- *the need to ensure the range of housing options and market segments have sufficient supply to respond to market interest, demand and activity, particularly to the west of Melbourne.*

²⁷ Settlement Strategy, p.62.

²⁸ At Page 27.

²⁹ G21 Plan Page 28.

84. In October 2014, parts of the Northern Geelong Growth Area were rezoned to Urban Growth Zone by the Minister for Planning.
85. In response to population growth that was greater than anticipated and following the above rezoning, Council undertook technical studies to inform a framework plan for the Northern and Western Geelong Growth Areas.
86. The background and technical reports that informed the Framework Plan analysed a range of matters to identify opportunities and constraints to future growth and inform the preferred urban structure. Issues examined comprised:
- Aboriginal cultural heritage;
 - Heritage;
 - Flora, fauna and biodiversity;
 - Geotechnical and hydrological issues;
 - Drainage, waterways and catchment management;
 - Sustainability;
 - Social infrastructure;
 - Activity centres;
 - Employment;
 - Capacity assessment;
 - Servicing and Infrastructure;
 - Movement, access and transport; and
 - Agricultural issues.
87. In addition to the technical analysis, Council facilitated extensive community and stakeholder consultation between 2016 and 2019 to inform preparation of a draft framework plan.

The vision and content of the Framework Plan

88. The vision for the growth areas is that they will *'exemplify Geelong's transformation as a clever and creative city by building diverse, localised and sustainable neighbourhoods*

that prioritise self-sufficiency whilst maximising connections to the Geelong community, economy and identity’.³⁰

89. The Framework Plan provides high-level guidance for the creation of nine new neighbourhoods in a manner that will:

- 89.1. create vibrant, active neighbourhoods;
- 89.2. protect and enhance the natural environment; and
- 89.3. encourage job creation.

90. A key design concept in the Framework Plan is the ‘Clever & Creative Corridor’. The corridor is envisaged as a tree-lined boulevard style transit corridor that gives preference to cycling, walking and public transport connections within and external to each neighbourhood. It is critical that the land for this corridor is secured initially to ensure the ability to deliver long-term public transport infrastructure. Acknowledging development timeframes, the corridor will be developed with interim and ultimate configurations.

91. Although the principles of land use and development are the same for Northern and Western Geelong Growth Areas, the Framework Plans respond to physical differences between the two areas. These differences include:

91.1. In the Northern Geelong Growth Area:

- the Lovely Banks monocline;
- the proximity of the Geelong Ring Road Employment Precinct, the Port of Geelong and Avalon Airport; and
- the proximity to the Lara Energetic Material Manufacturing Plant, trading as Chemring.

91.2. In the Western Geelong Growth Area:

- the Batesford Quarry;
- the Barwon and Moorabool Rivers and Cowies Creek;
- Batesford township; and
- The Dog Rocks Sanctuary.

³⁰ The Framework Plan, p. 5.

Mode shift

92. Council recognises that increasing and sustaining the increased use of active and public transport modes is critical to delivering successful new communities.
93. This infrastructure must be delivered early, while communities are establishing, so that residents can develop transport habits as soon they move in. To this end, the Framework Plan provides for:
 - 93.1. Accessible walking and cycling catchments.
 - 93.2. Internal and external bus routes with frequent services and suitable stops and shelters.
94. The Clever and Creative Corridor and in particular the early reservation of a 14 metre carriageway to secure this concept will ensure that at full development a prioritised system of public transport can be developed.

A high level plan

95. Importantly, the Framework Plan is a high-level plan that will guide the preparation of Precinct Structure Plans (**PSP**) and Development Contributions Plans (**DCP**) or Infrastructure Contributions Plans (**ICP**) for the smaller precincts within each growth area.
96. The planning of these precincts will refine the urban structure and infrastructure required.
97. The Framework Plan will perform a role similar to that of the Growth Corridor Plans prepared for the growth areas of Melbourne. These plans are high-level land use and transport plans to guide the delivery of key housing, employment and transport infrastructure in growth corridors in the north, west and south east of Melbourne³¹.
98. Like the Melbourne Growth Corridor Plans, the Framework Plan provides the indicative location for various land uses and infrastructure items. The plan informs the preparation

³¹ It is policy under Clause 11.03-2S to 'Implement the strategic directions in the Growth Area Framework Plans'.

of PSPs at a local level. The indicative items require further investigation that occurs at the PSP stage when more detailed, localised plans are prepared and implemented. This builds in flexibility to allow changes as the level of investigation becomes more specific.

99. Future PSPs must be consistent with the vision in the Framework Plan but further work will be required in respect of the indicative land use and infrastructure items. This is the usual process and is entirely appropriate. Council accepts Mr Woodland's advice that the exhibited requirement for 'general accordance with the Framework Plan' is instead amended to a requirement to 'have regard' to the Framework Plan in preparing PSPs (or similar wording) and to require general accordance only with the plans incorporated into the Planning Scheme.
100. The Framework Plan contains some greater detail than is commonly seen in framework plans. This reflects the extensive background work carried to inform the ultimate plan. In effect, this information is catalogue of existing conditions. This is useful information in a framework plan to assist in preparing PSPs, acknowledging there is flexibility in the application of the Framework when preparing those PSPs.

Submissions concerning detail of plan

101. A number of submissions to the Amendment seek changes:
- 101.1. To reflect the current preliminary design intent of a party (e.g. a relocation).
 - 101.2. On the basis that a scaling of features would suggest elements such as waterway corridors or drainage features are not appropriately sized.
 - 101.3. To implement greater detail to the Framework Plan.
102. Council submits that the level of detail and illustrative mapping is appropriate for the current stage of development. The preparation of the Framework Plan has relied on the investigations undertaken to date. The Framework Plan does not include the level of detail that will be presented in PSPs. The 'Future Urban Structures' identified in the Framework Plan are necessarily preliminary – they do not depict credited open space, the detailed localised drainage, schools and community facilities etc.³²

³² For example, see the Elcho Road East Precinct at Page 222 of the Framework Plan.

103. In many instances this detail cannot be presented at this time and need not be presented at this time.
104. Even after a PSP is prepared, matters are subject to change. Clause 37.07-9, Part B of the Urban Growth Zone provides that a permit granted for subdivision (by way of example) must be:
- 104.1. In general in accordance with the PSP; and
- 104.2. Include any condition or requirement in the Schedule to the UGZ or the PSP.
105. In most, if not all, recent PSPs further clarification on general accordance is included within specific sections of PSPs. For example, for Integrated Water Management Plans the location of design is specifically subject to a clause which permit alternative changes to the satisfaction of the drainage authorities.³³
106. In Council's submission, it is not necessary to facilitate changes to the plans within the Framework Plan to facilitate or meet current development intentions.
107. In addition to the protections afforded by the PSP preparation and UGZ permit processes, Council submits that:
- 107.1. Clause 21.20 as exhibited should be amended to not require that PSPs prepared must be in general accordance with the entire Framework Plan.³⁴
- 107.2. A new section should be included on Page 5 of the Framework Plan which reads:

Role of the framework plan

The Northern and Western Geelong Growth Areas Framework Plan is a high-level strategic document that describes considerations related to future urban development in the growth areas. The framework plan describes the existing site context of the growth areas and outlines a vision and set of urban development objectives and actions to inform the subsequent detailed preparation of precinct structure plans (PSPs).

³³ See for example Page 62 of the Mt Atkinson and Tarneit Plains PSP.

³⁴ Consistent with the evidence of Mr Woodland and others, wording to be confirmed.

The framework plan proposes the sequential preparation of nine PSPs. Each PSP provides the basis for localised urban development and investment and will further consider and incorporate relevant directions outlined in this framework plan. Each PSP will elaborate on the framework plan by adding important land uses that support the local community such as local roads, schools, community facilities and open space not included at this preliminary level of planning.

Preparation of each PSP will be the subject of further detailed technical investigations and reports specific to that precinct. A separate planning scheme amendment will facilitate the detailed future urban structure and infrastructure requirements of the precincts. The location and extent of some features (e.g. road network, waterways and activity centres) depicted in plan set of the framework plan are accordingly illustrative or enlarged with the intent that they will be refined or amended as part of the preparation of each PSP.

The framework plan summarises existing technical investigations that provide a preliminary basis for the preparation of each PSP. It is important to ensure that the preparation of the PSP allows for the consideration and adoption of new technical information that may provide increased benefits to the future community.

108. Council submits that this additional text is sufficient to describe the proper utilisation of the Framework Plan and its role in the preparation of future PSPs.

Appropriately sized PSPs

109. The boundaries of the PSP have been determined by a range of logical boundaries be they roads, the desire that river corridors are planned holistically and the ability to deliver a PSP outcome having regard to infrastructure uses and ownership.
110. Council submits that the result is a logical arrangement of precincts. While it is possible to contend for a different boundary here and further property there, Council save as disclosed in its Council report, does not propose to amend the PSP boundaries at this time in the Framework Plan.
111. The resulting PSP are all of an appropriate size. In the metropolitan and regional context, there are of course larger PSPs that have been prepared but equally there are

smaller PSPs that have been successfully planned. Of the smaller precincts, even Merrawarp Road in the south of the west at 375ha gross will deliver homes for some 6,500 people. By comparison, if considered in isolation that is the approximate population of Portarlington/St Leonards.³⁵

112. Council has prepared the following list of smaller and larger modern precinct structure plans.

Locations	PSP	Size in hectares
Metropolitan Melbourne	Brompton Lodge (Melton CC)	112
	Tarneit West (Wyndham CC)	120
	Lindum Vale (Hume CC)	144
	Quandong (Wyndham CC)	153
	Taylor's Hill (Melton CC)	216
	Truganina South (Wyndham CC)	250
	Clyde North (Casey CC)	479
	Tarneit Plains (Melton CC)	482
	Cranbourne East (Casey CC)	578
	Pakenham East (Cardinia CC)	630
	Rockbank (Melton CC)	752
	Rockbank North (Melton CC)	786
	Cranbourne West (Casey CC)	794
	Cardinia Road (Cardinia CC)	1,156
	Clyde Creek (Casey CC)	1,154
	Koroit (Melton CC)	925
	Mt Atkinson (Melton CC)	1,049
	Officer (Cardinia CC)	1,021
	Plumpton (Melton CC)	1,016
	Cardinia Road (Cardinia CC)	1,156
Clyde Creek (Casey CC)	1,154	
Regional Victoria	Drouin	900
	East of Aberline (Warrnambool)	360
	Shepparton North East	177
	Shepparton South East	385
	Warragul	1,400
	Leneva-Baranduda (Wodonga)	1,000+

Sequencing of precincts

113. The Framework Plan provides for the orderly and sequenced development of precincts by specifying which precincts will be developed in the short, medium and long term.

³⁵ Identified above at the 42 largest settlement in Victoria.

114. Council will lead and manage this process to ensure that it is done in a strategic, logical and efficient manner.

115. To manage this process, the Framework Plan suggests a governance structure which requires Council to consider and approve a report prepared by the proponent of a proposed PSP. To be approved, the report would, in summary, outline the scale of proposed precinct and whether a functioning community can be delivered and whether the services and infrastructure required can be provided.

116. The sequencing of development is critical to achieving the vision of the Framework Plan whereby the provision of public transport and essential infrastructure is provided concurrent with residential development from the outset.

CONCLUSION

117. Council will provide its Part B submission following the expert evidence to be called by Council.

12 November 2019

Greg Tobin
HARWOOD ANDREWS
on behalf of
Greater Geelong City Council

Appendix 1

Council peer review expert recommendations and Council's response

Michael Barlow

Recommendations for the planning scheme ordinance

Paragraph Ref.	Recommendation	Council's position
24, 108	<p>Amend exhibited version of Clause 21.14 as follows:</p> <p>Further Work – page 7 of 17</p> <ul style="list-style-type: none"> Update the proposed task Work with the state government on the designation of the Bellarine-Peninsula under the Distinctive Areas and Landscapes Act 2018 to reflect the fact the declaration has been made and the next step is to finalise a Statement of Planning Policy. Modify the requirement to undertake a structure plan to that of reviewing the long-term township boundary having regard to all but one of the considerations listed in the clause. Replace the words <i>other planned growth on the Bellarine Peninsula</i> (dot point 3) with the words <i>other planned growth in Greater Geelong</i>. 	<p>First dot point is supported</p> <p>Second dot point is not supported. This further work clause needs to be reconsidered in light of the DAL designation. The upcoming DAL Statement of Planning Policy process is likely to address the matters in the Further Work clause and will determine the long-term settlement boundary.</p>
25, 155	<p>Modify the Housing and Settlement Framework map at Clause 21.06 to remove the word 'permanent' from the 'indicative permanent settlement boundary'.</p> <p>[NB: 'permanent' can be included once the settlement boundary has been implemented]</p>	Supported.

Recommendations for the Settlement Strategy

Paragraph Ref.	Recommendation	Council's position
26, 146, 156	<p>Modify the Settlement Strategy to refer to a '<i>long-term settlement boundary</i>' for urban Geelong rather than a permanent settlement boundary. Reference to the settlement boundaries for the Bellarine townships could be described as 'enduring settlement boundary'.</p>	<p>Not opposed in principle.</p> <p>Council observes that with background documents there exist differing views as to the need to update underlying strategies in the context of an Amendment.</p>

Paragraph Ref.	Recommendation	Council's position
	[NB: 'permanent' can be included once the settlement boundary has been implemented]	
27, 171	Identify the northern part of Boral land as a potential future investigation area.	<p>Not supported. Council officers do not dismiss the attributes of the Boral land as a potential longterm growth area. However, it is premature to designate it for future investigation at this point in time as there is adequate lot supply in other areas including NWGGA and Armstrong Creek.</p> <p>Subject to the commentary above Council would not oppose include some further discussion on the Boral land in the Settlement Strategy document (subject to appropriate qualifications) and must consider any Panel recommendations on this issue.</p> <p>Council observes that the recent Moolap Coastal Strategic Framework Plan is expected to shortly be the subject of a Ministerial Amendment. Given that this plan is more developed and proposed some 12,000 additional residents it would be logical that this would also be part of any longer terms growth update in the Settlement Strategy.</p>

Mark Woodland

Recommendations for the planning scheme ordinance

Paragraph Ref.	Recommendation	Council's position
38, 222-233	<p>Amend wording in Clause 21.20 relating to giving effect to the Framework Plans should be amended as follows:</p> <p><i>“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.”</i></p>	Supported in principle, Council is considering the final wording to be adopted.
39, 222-233	<p>In addition to the above, include an additional strategy be included in Clause 21.20-4 relating to the Background Document:</p> <p><i>“Land use and development should have regard to the Northern and Western Geelong Growth Areas Framework Plans.” [ie the Background documents]</i></p>	<p>Supported. However this strategy would be better placed in 21.20-3 as the second strategy (after the one referred to above above).</p> <p>Council considers that the second bullet under 21.20-3 will require similar changes as it current requires sequencing 'in accordance' with the</p>

Paragraph Ref.	Recommendation	Council's position
		Framework Plan and this should instead be similar to 'have regard to' or be guided by (per Jason Black).
234	Alternatively, to the approach above, insert an abridged version of the Framework Plan as an Incorporated document and leave the current drafting of the ordinance.	Not supported.
41, 42, 242, 243	<p>Include in the Scheme sequencing criteria in Actions N5.2.1 and W.5.2.1 and include the following additional factors:</p> <ul style="list-style-type: none"> • 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. <p>[NB: if criteria added to the Scheme, not necessary to specify PSP order in the Scheme].</p>	<p>Not supported.</p> <p>Removal of the short, medium and long term designations of precincts is not supported. The timing designations outlined in the Framework Plan give regard to infrastructure delivery and servicing, as well as major constraints to development (e.g. fragmentation and quarrying). Precincts have multiple factors that promote or impede their development potential/timing and removing the proposed designation will lead to uncertainty for Council in future when considering the merits of sequencing the preparation of the PSPs.</p> <p>If change was required, having regard to Council's comments above these additional factors are better placed within the Framework Plans.</p>
64, 346	Re LEMMP - Amend Clause 21.10 to reference the need to protect existing buffers of the LEMMP	Not supported this issue is flagged in the Framework Plan and as with other buffers will need to be worked through at the PSP stage.
68, 369	Zone application to land within powerline easement could be dealt within in the Amendment or at PSP process.	Application of the UGZ within the easement is not supported and is unlikely to be reconsidered as part of the PSP process. The subject land occupies the furthest extent of the growth area and does not provide a logical location for public uses.

Recommendations for the Framework Plan

Paragraph Ref.	Recommendation	Council's position
C&CC		
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).	Supported. Notional connections can be illustrated on Plan 5.

Paragraph Ref.	Recommendation	Council's position
18, 130, 132, 133	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.	Supported. Further discussion can be included with regard to housing densities. However, it should be noted that the 'Housing' section of the document and associated plans illustrate a higher density housing requirement along the corridor.
137	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.	Not supported. The delivery of interim public transport services is likely to be provided by conventional bus routes within the road carriageway. Establishing bus stops within the curb outstand and designing intersections that allow bus priority movements are methods to ensure that public transport services move freely through the road network. However, these elements should be considered as part of the PSP process.
19	Simplify the text and diagrammatic descriptions of the land use outcomes along the C&CC within Framework Plan (pp 45-53).	Not supported on basis of information available in statement. The images are illustrative and demonstrate other benefits that the C&CC may be able to deliver as part of the design concept.
Environment		
20, 140	Include an integrated open space plan that brings together all the various public space and walking/cycling network features into a single view.	Not supported. This is PSP level detail
21, 146	<i>Landforms and view lines in NGGA</i> - 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.	Not supported. Council would consider adding additional information in respect of neighbouring land uses to actions relating to the monocline ridgeway.
22, 149	<i>Landforms and viewlines in WGGA</i> - 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.	Not supported. This is a matter for PSP level investigation.
23, 158	<i>Biodiversity</i> - 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.	Not supported. This is PSP level detail..

Paragraph Ref.	Recommendation	Council's position
Built environment and neighbourhood design		
24, 164-166	<i>Built Environment in WGGA</i> - Clarify the wording of Actions W1.6.1 and W1.6.3.	Not supported. W1.6.1 refers specifically to the Batesford township and immediate surroundings. W1.6.3 refers to other areas of rural living in the growth area that will be allowed to transition to conventional density residential development as part of the relevant precinct structure planning process.
25, 167	<i>Built Environment in WGGA</i> – Amend the description of the 'lakeside residential' precinct on the Framework Plan to say ' <i>investigation area: potential urban - subject to assessment of site constraints.</i> ' and include an Action in the Framework Plan relating to this.	Not supported. All land is subject to assessment of onsite constraints as part of the greenfield development process. The future urban structure plan indicates the intended ultimate development scenario for land in the growth area; actions in the Framework Plan adequately describe that further investigations will be required prior to the development of land surrounding the quarry.
26, 170	<i>Neighbourhood design</i> - Consider amending the 20 minute neighbourhood concept to a 10-minute neighbourhood concept.	Not supported. Lovely Banks Development Group has made a similar submission – the concept's intent is generally supported but the Framework Plan is not informed by investigations relating to the concept. Metropolitan PSPs refer to the concept of the 20-minute neighbourhood.
27, 173	<i>Neighbourhood design</i> – Include additional text summarising the key land use and accessibility ingredients of a 10 minute neighbourhood.	Not supported on the basis of the above comments.
28, 174	<i>Neighbourhood design</i> – Include descriptions for what is meant by low, conventional, medium and high density.	Not supported. This is PSP level detail.
175	<i>Neighbourhood design in NGGA</i> – 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 at Action N.2.1.5.	Not supported. A concept plan for the monocline ridgeway will be undertaken as part of the relevant precinct structure plans. PSP level investigation and detail.
Social infrastructure		
29, 181	<i>Social infrastructure</i> – 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.	Not supported. 'Land suitable for community facility / sport reserve' is indicative and can be refined as part of the PSP process.
30, 182	<i>Social Infrastructure</i> - Include text that explains the implications of the gas	Not supported. This is a matter for PSP level investigation.

Paragraph Ref.	Recommendation	Council's position
	pipeline buffer on the location of certain types of social infrastructure (community centres, schools, sports pavilions).	
Activity centres & employment		
31, 186	<i>Activity Centres in the NGAA</i> – Confirm whether locating the northernmost neighbourhood centre within the designated Gas Pipeline measurement length is acceptable or not.	Not supported. This is a matter for PSP level investigation.
32, 190	<i>Activity Centres in WGGA</i> – 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. [NB: This could be dealt with at PSP stage].	Not supported. The current location is central to the surrounding residential catchment. However, it is a matter for investigation at the PSP stage.
33, 202-203	<i>Employment</i> - 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.	Not supported. This is not currently supported by technical studies. However, it is a matter for the PSP stage.
Precincts		
34, 212	<i>Precinct concept plans</i> - 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.	Support for including a clarifying statement within the Framework Plan. The removal of the plans is not supported.
35, 214	<i>Precinct Infrastructure requirements</i> -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.	Supported.
41	Include in Actions N5.2.1 and W.5.2.1 the following additional factors: <ul style="list-style-type: none"> • 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 	Supported, noting that these considerations should not replace the existing directions in the Framework Plan relating to precinct boundaries and sequencing.

Paragraph Ref.	Recommendation	Council's position
	<p>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.</p> <ul style="list-style-type: none"> • Whether a precinct's development will support thee effective and early development of public transport infrastructure, town centres and employment precincts 	
Chemring buffer		
64	Re LEMMP - Modify Plan 23 to remove any suggestion that medium density housing might be supported within the catchment of the C&CC.	Not supported. This is detail dealt with at the PSP stage.