



Amendment C395 to the Greater Geelong Planning Scheme

Expert Evidence Statement: Jason Black

Land Within the Western Geelong Growth Area (McCann Family Land)

7 November 2019

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1 INTRODUCTION

1. My name is Jason Robert Black of 48 Gala Supreme Close, Mordialloc and I am the Managing Director of Insight Planning Consultants Pty Ltd.
2. I hold a Bachelor in Applied Science (Planning) from the Royal Melbourne Institute of Technology (RMIT). I have twenty years planning practice experience in local government and private consultancy.
3. I am a Fellow of the Planning Institute of Australia, a Member of the Victorian Planning & Environmental Law Association, a Member of the Urban Development Institute of Australia and I am a Registered Planner as recognised by the Planning Institute of Australia.
4. My experience as a planning consultant providing advice to both local government and private sector clients in relation to numerous residential subdivisions, development plans, precinct structure plans and development contributions plans provides me with the necessary background to carry out a review of a range of planning documents including Plans of Subdivision, Development Plans, Precinct Structure Plans, Open Space Strategies, Planning Scheme Provisions, Planning Permits, Section 173 Agreements and other relevant planning documents.
5. I have been instructed by Norton Rose Fulbright Lawyers to review the Amendment material and extensive list of supporting technical reports and prepare an expert report considering town planning matters arising from the Amendment and appear at the Panel hearing for this matter.
6. In undertaking my review, I have been asked to specifically review:
 - the proposed changes to Clause 21.08 in relation to developer contributions and infrastructure funding; and
 - the drafting of the proposed Clause 21.20 (noting that it references the Framework Plan as a background document and includes a number of strategies that seek to give effect to elements of that plan).
7. In forming my opinion, I have made the necessary enquiries and reviewed the exhibited and supporting documents, including:
 - *Amendment C395 Documents, including proposed Clauses and Zone Maps;*
 - *Northern and Western Geelong Growth Areas Framework Plan dated March 2019;*
 - *City of Greater Settlement Strategy dated October 2018;*
 - *Bushfire Planning Assessment dated 29 May 2019.*

2 SITE CONTEXT

8. Consideration and understanding of the site context is an important step in planning for the future residential subdivision of an area.
9. The land subject to this Amendment is all land within the Municipality of Greater Geelong with specific policy affecting the Northern and Western Geelong Growth Areas. The rezoning affects selected properties in Batesford, Bell Post Hill, Fyansford, Hamlyn Heights, Lara, Lovely Banks and Moorabool in the proposed Northern and Western Geelong Growth Areas as shown on the exhibited planning scheme maps.

2.1 SITE DESCRIPTION

10. Norton Rose Fulbright Lawyers have requested that I review this Amendment specifically in relation to the land area generally within the Western Geelong Growth Area. The Western Growth Area is generally bounded by the Geelong Ring Road to the east, the Barwon River to the south, the Geelong-Ballarat rail line to the north and the Batesford township to the west.
11. The majority of the land falls within a Designated Bushfire Prone Area. An Area of Aboriginal Cultural Heritage Sensitivity applies to land along the Barwon River corridor which traverses through the site.

2.2 SURROUNDS

12. The land immediately to the north-east is zoned Rural Living, land to the east of the Geelong Ring Road is zoned General residential, land to the north-west, west and south is zoned Farming, with an area of Low Density Residential west of Batesford township to the north-west of the subject land. The railway corridor bordering the subject land to the north is zoned Public Use. The Geelong Ring Road bordering the subject land to the east is a Road Zone – Category 1 road.
13. Figure 1 provides an aerial image of the area surrounding the Western Growth Area.



Figure 1 - Aerial Map of Western Geelong Growth Area (LandChecker 2019)

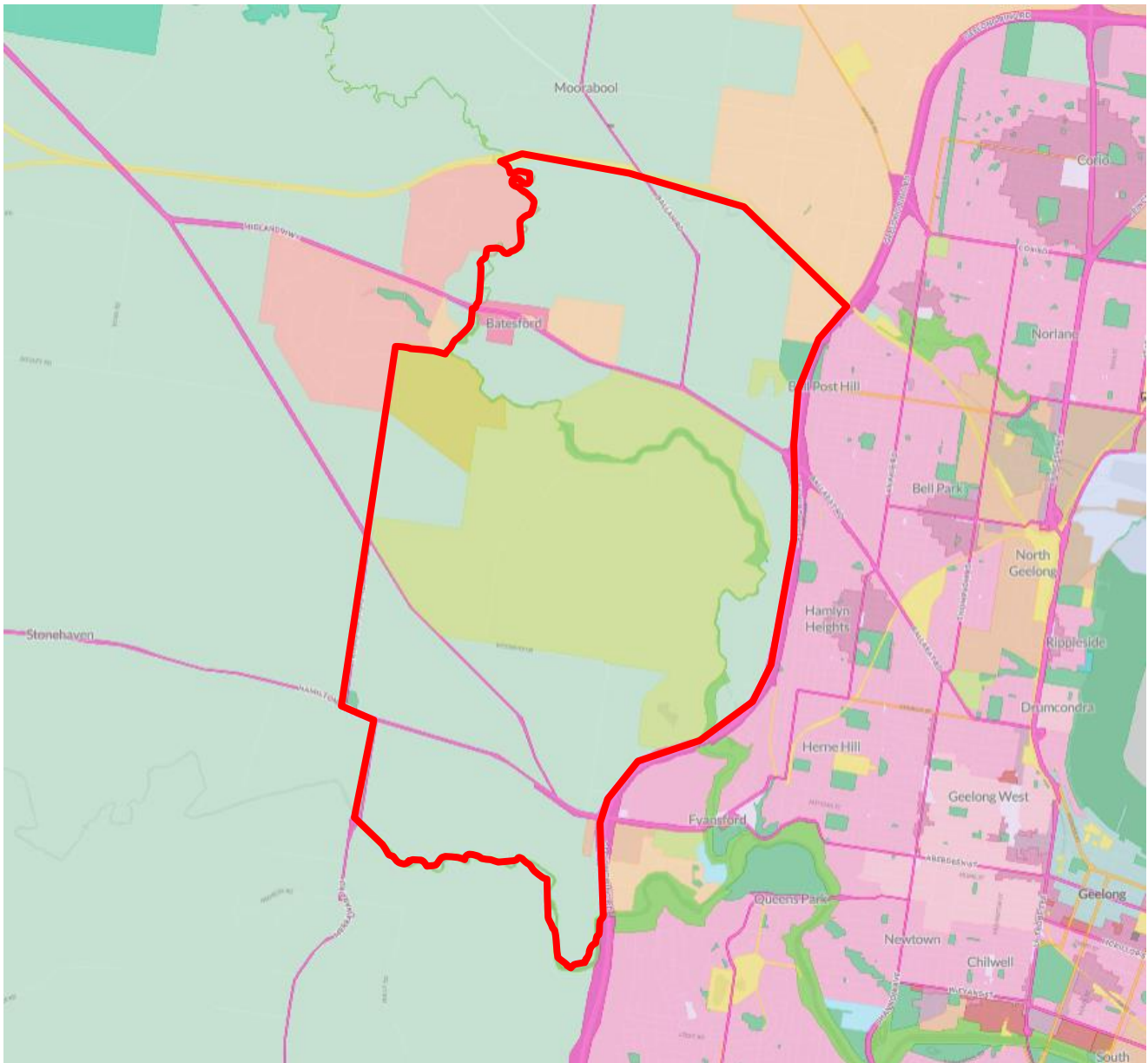


Figure 2 - Zoning Map of Western Geelong Growth Area (LandChecker 2019)

3 GREATER GEELONG PLANNING SCHEME PROVISIONS

14. The land is within the City of Greater Geelong where the Greater Geelong Planning Scheme applies.
15. The subject land is made up of several parcels of land, which are zoned Farming, Rural Living, Industrial 1, Special Use, Rural Conservation, Public Conservation and Resource and Public Park and Recreation.

3.1 RURAL CONSERVATION ZONE

16. Pursuant to Clause 35.06, the Purpose of the Rural Conservation Zone is:
 - *To protect and enhance the natural environment and natural processes for their historic, archaeological and scientific interest, landscape, faunal habitat and cultural values*
 - *To protect and enhance natural resources and the biodiversity of the area*
 - *To encourage development and use of land which is consistent with sustainable land management and land capability practices, and which takes into account the conservation values and environmental sensitivity of the locality*
 - *To provide for agricultural use consistent with the conservation of environmental and landscape values of the area*
 - *To conserve and enhance the cultural significance and character of open rural and scenic non-urban landscapes*

3.2 INDUSTRIAL 1 ZONE

17. Pursuant to Clause 3.3.01, the purpose of the Industrial 1 Zone is:
 - *To provide for manufacturing industry the storage and distribution of goods and associated uses in a manner which does not affect the safety and amenity of local communities*

3.3 RURAL LIVING ZONE

18. Pursuant to Clause 35.03, the purpose of the Rural Living Zone is:
 - *To provide for residential use in a rural environment*
 - *To provide for agricultural land uses which do not adversely affect the amenity of surrounding land uses*
 - *To protect and enhance the natural resources, biodiversity and landscape and heritage values of the area*
 - *To encourage use and development of land based on comprehensive and sustainable land management practices and infrastructure provision*

3.4 FARMING ZONE

19. Pursuant to Clause 35.07, the Purpose of the Farming Zone is:
 - *To provide for the use of land for agriculture*
 - *To encourage the retention of productive agricultural land*
 - *To ensure that non-agricultural uses, including dwellings, do not adversely affect the use of land for agriculture*

- To encourage the retention of employment and population to support rural communities
- To encourage use and development of land based on comprehensive and sustainable land management practices and infrastructure provision

3.5 PUBLIC PARK AND RECREATION ZONE

20. Pursuant to Clause 36.02, the Purpose of the Public Park and Recreation Zone is:

- *To recognise areas for public recreation and open space*
- *To protect and conserve areas of significance where appropriate*
- *To provide for commercial uses where appropriate*

3.6 PUBLIC CONSERVATION AND RESOURCE ZONE

21. Pursuant to Clause 36.03, the Purpose of the Public Conservation and Resource Zone is:

- *To protect and conserve the natural environment and natural processes for their historic, scientific, landscape, habitat or cultural values*
- *To provide facilities which assist in public education and interpretation of the natural environment with minimal degradation of the natural environment or natural processes*
- *To provide for appropriate resource-based uses*

3.7 SPECIAL USE ZONE

22. Pursuant to Clause 37.01, the Purpose of the Special Use Zone is:

- *To recognise or provide for the use and development of land for specific purposes as identified in a schedule to this zone*

23. Special Use Zone, Schedule 7 – Earth and Energy Resources Industry, identifies the following Purpose:

- *To recognise or provide for the use and development of land for earth and energy resources industry*
- *To encourage interim use of land compatible with the use and development of nearby land*
- *To encourage land management practice and rehabilitation that minimizes adverse impact on the use and development of nearby land*

3.8 LOCAL PLANNING POLICY FRAMEWORK

24. The following is a summary of the current Local Planning Policy Framework that is relevant to the future development of the study area.

25. **Clause 21.06 – Settlement and Housing** provides direction around urban growth and urban consolidation, including directing growth to the identified growth locations.

26. Relevant Strategies to achieve the objectives of this clause include:

- *Ensure that land use and development does not compromise the capacity or potential future development of areas designated for future urban growth, as shown on the relevant Structure Plan or Urban Growth Plan*

27. Further work identified within the Clause relevant to the subject land includes (amongst other things):

- *As a priority commence an investigation into the future residential and industrial land use needs for Geelong, as a basis for future growth area planning, that would include:*
 - *The assessment of the environmental, resource, landscape, development pattern, access, servicing, land use, economic and social constraints and opportunities associated with possible growth areas around Geelong;*
 - *The identification of a preferred growth area or areas; and*
 - *The preparation of detailed growth area plans*
- *Prepare a settlement strategy for the municipality.*

28. **Clause 21.08 – Development and Community Infrastructure** provides direction around development contributions, to ensure infrastructure, open space and transport infrastructure is delivered in an efficient and timely manner, in line with population growth.

29. **Clause 72.08 – Background Documents**, lists Background Documents as referenced within the Planning Scheme, but that do not form a part of the Planning Scheme. The relevant Background Documents listed include:

- *G21 Regional Growth Plan (Geelong Region Alliance, 2013)*

4 STRATEGIC PLANNING BACKGROUND

30. There have been multiple strategic planning processes that have been undertaken in recent years that (amongst other things) provide direction for urban growth within the Western Geelong Growth Area.

4.1 G21 REGIONAL GROWTH PLAN – IMPLEMENTATION PLAN, NOVEMBER 2013

31. The G21 Regional Growth Plan covers the municipalities of City of Greater Geelong, Colac Otway Shire, Surf Coast Shire, Borough of Queenscliff and the southern portion of Golden Plains Shire.

32. The plan provides broad direction for regional land use and development in the G21 region (Geelong).

33. The *G21 Regional Growth Plan – Implementation Plan, November 2013* identifies the subject land as being part of the Western Further Investigation Area (FIA) or ‘strategic opportunity area’ to be examined for its potential to provide capacity for the G21 region to grow to and beyond 500,000 people and respond to higher growth rates in the future.



Figure 3 - Further Investigation Areas (G21 Implementation Plan 2013)

34. The Implementation Plan seeks to provide information about the FIAs to assist the next steps of planning by identifying:
- *The relative constraints and opportunities of each area to identify appropriate planning responses*
 - *Key community and urban planning outcomes to be considered in future growth area planning*
 - *A range of possible next planning steps including detailed area planning, policy development and zoning, infrastructure planning, land release timing triggers and staging directions (pg. 85)*
35. Analysis of the Northern and Western FIAs outlines their suitability for growth based on planning context, land capability, accessibility and capacity to deliver an integrated community. The relative ability of these growth areas to deliver livable, vibrant and cohesive communities is considered against six goals:
- *Ability to create a diverse and unique community*
 - *Ability to deliver significant community benefit to Geelong*
 - *Ability to provide accessible and integrated transport choices*
 - *Ability to provide efficient infrastructure and services*
 - *Ability to ensure efficient and sustainable use of land and resources*
 - *Ability to provide exceptional physical environments (pg. 86)*
36. The Implementation Plan states that *the Western FIA presents an opportunity to create major regional community assets and biodiversity enhancements integrated with a diversity of housing options; however complex site, road connection and capacity challenges would need to be addressed.*
37. The Implementation Plan outlines future growth area outcomes that should be implemented in the delivery of the Northern and Western Geelong Growth Areas including:
- *Taking 'the next step' in planning for new communities, including development that achieves zero carbon, zero waste, sustainable water, sustainable transport and environmental outcomes*
 - *Community infrastructure provisions, community design and housing diversity*
 - *Site specific considerations, including growth area extent, interfaces, integration, infrastructure, employment opportunities and transport choices*
38. The Implementation Plan identifies next steps to highlight the importance of guiding and supporting the delivery of the Northern and Western Geelong Growth Areas and considers timing and sequencing of development and 'out of sequence' considerations, sequential or concurrent development of each growth area, and future rezoning and precinct structure plans (pg. 17. Northern and Western Geelong Growth Areas Framework Plan)

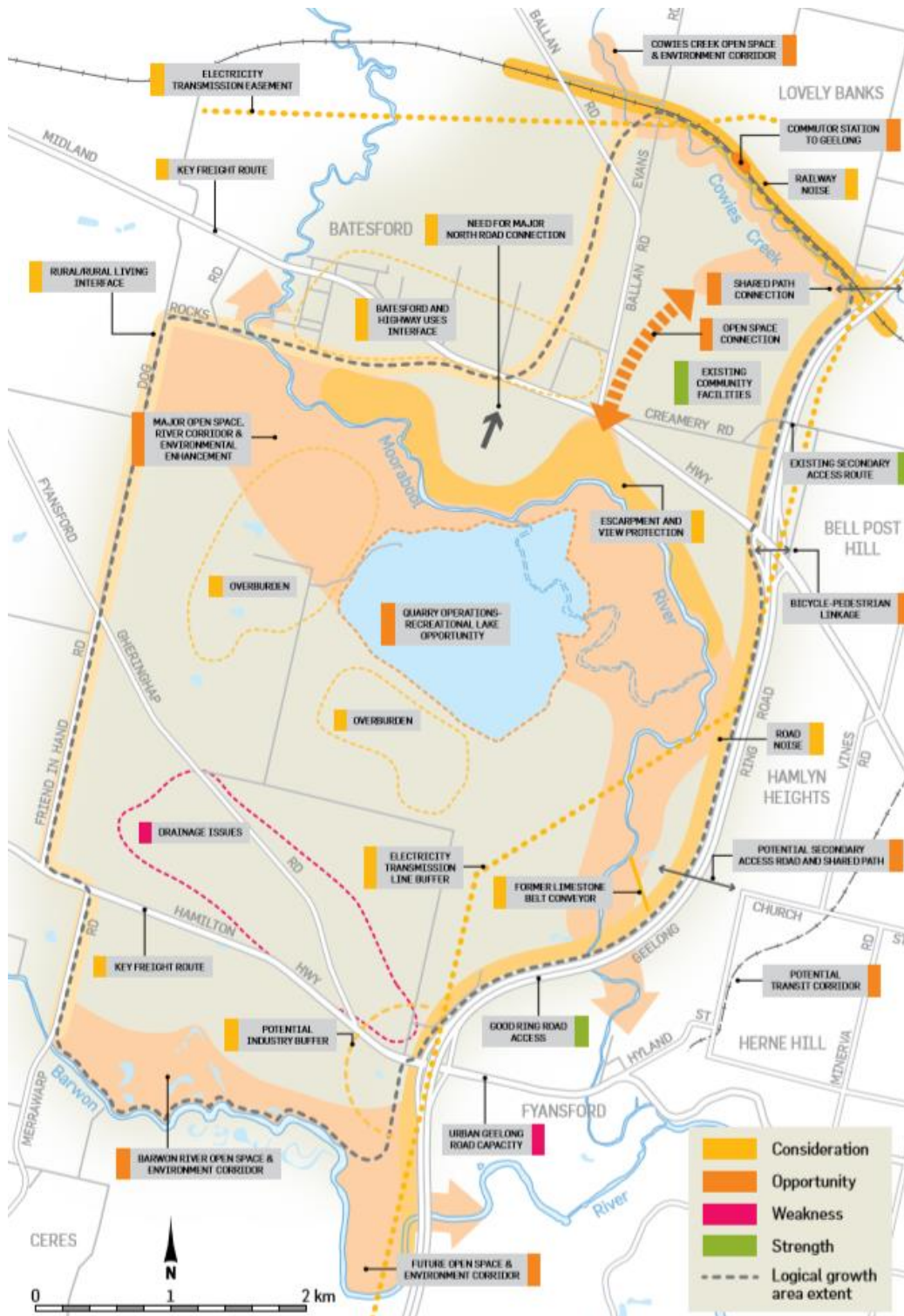


Figure 4 - Western FIA Issues for Consideration (G21 Implementation Plan 2013)

4.2 CITY OF GREATER GEELONG'S SETTLEMENT STRATEGY (2018)

39. In late 2016, Spatial Economics was commissioned to review the City of Greater Geelong's population and housing demand forecasts and prepare an updated settlement strategy for Greater Geelong.
40. The Strategy states that the purpose is:
- *To analyse future housing needs and trends*
 - *To develop a clear policy framework that will guide planning and decision making and*
 - *To help the city meet Great Geelong's future housing needs*
41. The strategy is intended to address municipal housing needs until 2036. This meets the requirement of the State Planning Policy Framework that all Victorian councils must plan to accommodate projected population growth over a 15-year period. A key question for the strategy is whether the current policy framework can accommodate forecast growth out to 2051.
42. The Strategy states that it does not:
- *Make recommendations about specific boundaries for proposed growth areas and townships but estimates housing capacity on the basis of the boundaries already identified in strategic planning documents*
 - *Address the detailed structure planning of areas identified for future residential growth*
43. The key Directions relating to the subject land identified in the Strategy are to:
- *Direct the majority of future housing needs to urban Geelong (urban infill), Armstrong Creek and the Northern and Western Geelong Growth Areas*
 - *Ensure that development of new growth areas is guided by a strategic framework plan and infrastructure plan that outlines the orderly and sequential preparation of precinct structure plans*
 - *Commence development in at least one new growth area by 2025, by initiating precinct structure planning after the framework plan has been approved*
 - *Manage the number of precinct structure plans that can be prepared simultaneously*
 - *Pursue options to implement permanent settlement boundaries for Greater Geelong*
44. The Strategy identifies that *the land within the Northern Growth Area (16,000 dwellings) and the Western Growth Area (18,000 dwellings) has the combined capacity to accommodate 110,000 residents. The project is the largest urban growth project in regional Victoria, comprising 5,367 hectares.*
45. In relation to the Spatial Distribution of Growth and Land Supply, the Strategy states that *'should growth continue at current forecast rates, at least part of the Northern and Western Geelong Growth Areas will be required before 2036. There will also be a need for substantial overlap between the effective completion of development in Armstrong Creek and the commencement of development in at least one of the new growth areas. Therefore, planning needs to be in place to allow development to commence in at least one of these new growth areas by 2025'.*



- ESTABLISHED AREAS
- PLANNED GROWTH AREA
- FUTURE GROWTH AREAS
- INVESTIGATION AREA
STATE GOVERNMENT CURRENTLY PREPARING PLAN
- 500 FUTURE DWELLING SUPPLY (BROAD HECTARE AND MAJOR INFILL SITES ONLY)

- PASSENGER RAIL
- STATIONS
- EXISTING FREIGHT RAIL
- FUTURE NON-OPERATING TRANSIT CORRIDOR
- HIGHWAYS
- MAJOR ROADS
- POTENTIAL FUTURE ROAD LINK (ROUTE TBC)

Figure 5 - Major land supply stocks by location, as of 1 Jan 2017 (Settlement Strategy 2018)

46. In relation to Managing Growth, the Strategy states that *'the scale of funding potentially needed for local infrastructure in the Northern and Western Geelong Growth Areas is a major consideration. A high-level infrastructure assessment of the costs and expenditure requirements for these two growth areas form part of the current framework planning'*.
47. Additionally, *'private sector investment and contributions toward funding early investment in local infrastructure could bring development forward. Such contributions would need to be fully explored and underpinned by binding funding agreements. These funding agreements would then help inform decision making about the timing and staging of growth areas'*.

4.3 NORTHERN AND WESTERN GEELONG GROWTH AREAS FRAMEWORK PLAN (2019)

48. The Framework Plan sets out the following vision for the Western Geelong Growth Area:

'Western Geelong will prosper as a district of lakeside neighbourhoods connected by healthy waterways and attractive open spaces that strengthen Geelong's identity as a city built around water'.

49. The Framework Plan identifies the following Urban Development Objectives in relation to the Western Geelong Growth Area:

- *Create diverse and vibrant new urban communities*
- *Integrate transport and land use planning*
- *Plan for local employment*
- *Create growth areas with high amenity and character*
- *Protect biodiversity*
- *Create integrated open space networks*
- *Plan for environmental sustainability*
- *Stage development to ensure the efficient and orderly provision of infrastructure and services*

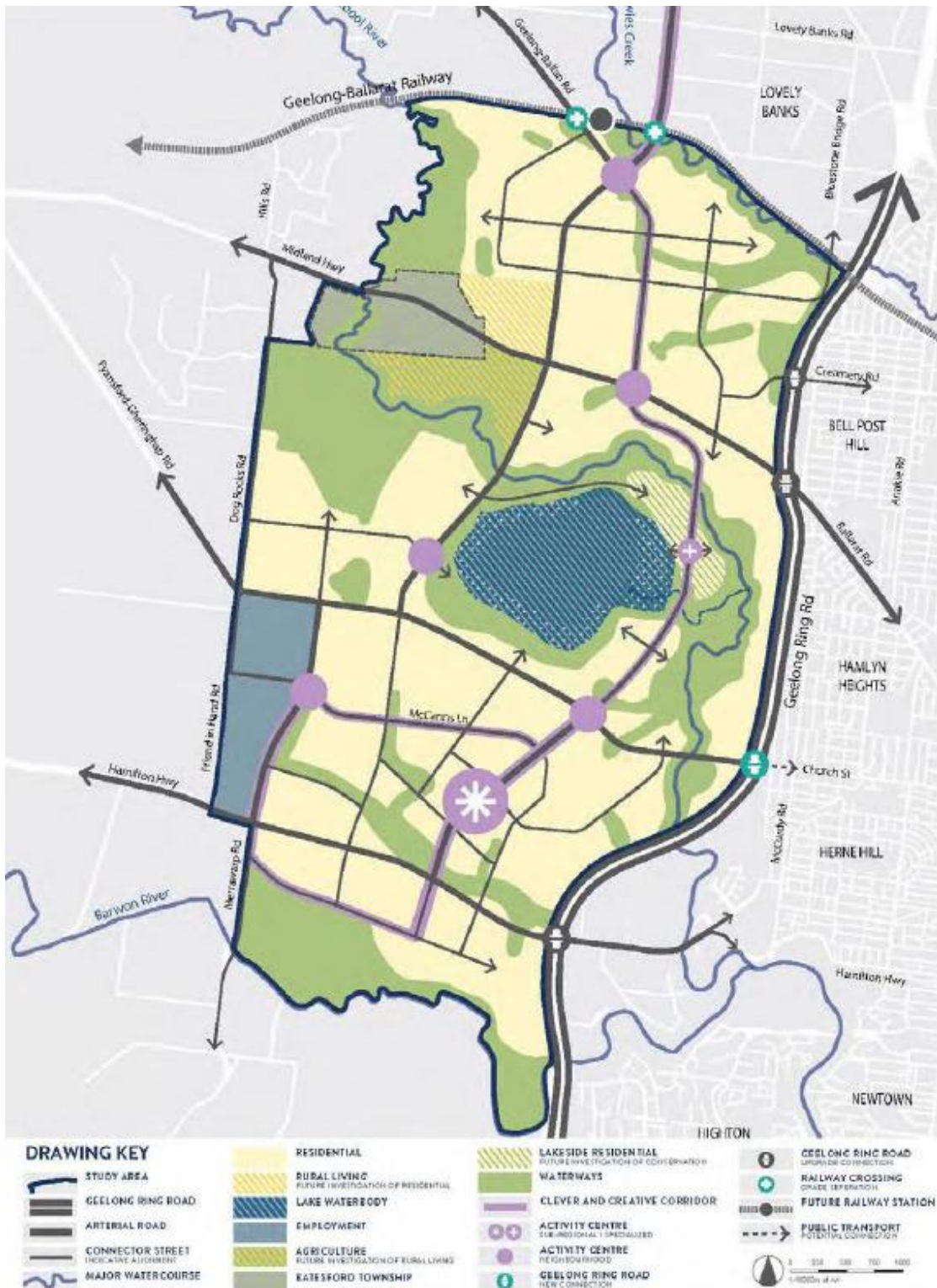


Figure 6 - Western Geelong Growth Area Future Urban Structure Plan (NWGA Framework Plan 2019)

50. One of the key Actions relevant to the subject land in relation to the Environment is:

Rehabilitation of Batesford Quarry will be completed to an urban standard prior to urban development in its proximity. This includes detailed master planning of the lake transformation to outline its integration with the surrounding urban landscape including public access and safety in relation to land stability and slope of the surrounding land... Land capability for the proposed quarry end use and surrounding areas of adjacent stockpiles and river banks, escarpments and floodplains must be proven prior to commencement of a precinct structure plan.

51. The Framework Plan also identifies that *'ground water will naturally fill the quarry pit when extraction is concluded, gradually transitioning the quarry into a lake. Filling of the lake will likely occur over 10-20 years based on several factors, including the potential use of recycled water'*.
52. *'Delivery' 'considers the sustainable sequencing of development in the Northern and Western Geelong Growth Areas by prioritizing precincts and projecting the essential infrastructure and services required to support Geelong's new neighbourhoods'*.
53. The Framework Plan states that *'delivery of utilities and infrastructure is particularly complex in the Western Geelong Growth Area given that initial urban development will occur to the north and south of Batesford Quarry as its operations remain active. Strategic planning of infrastructure will be important in facilitating early growth and delivering networks that connect when the quarry area is transformed'*.
54. Additionally, the Framework Plans states that *'the Western Geelong Growth Area will be planned and developed in an orderly sequence of short, medium and long-term precincts'* as illustrated on Figure 7 below.

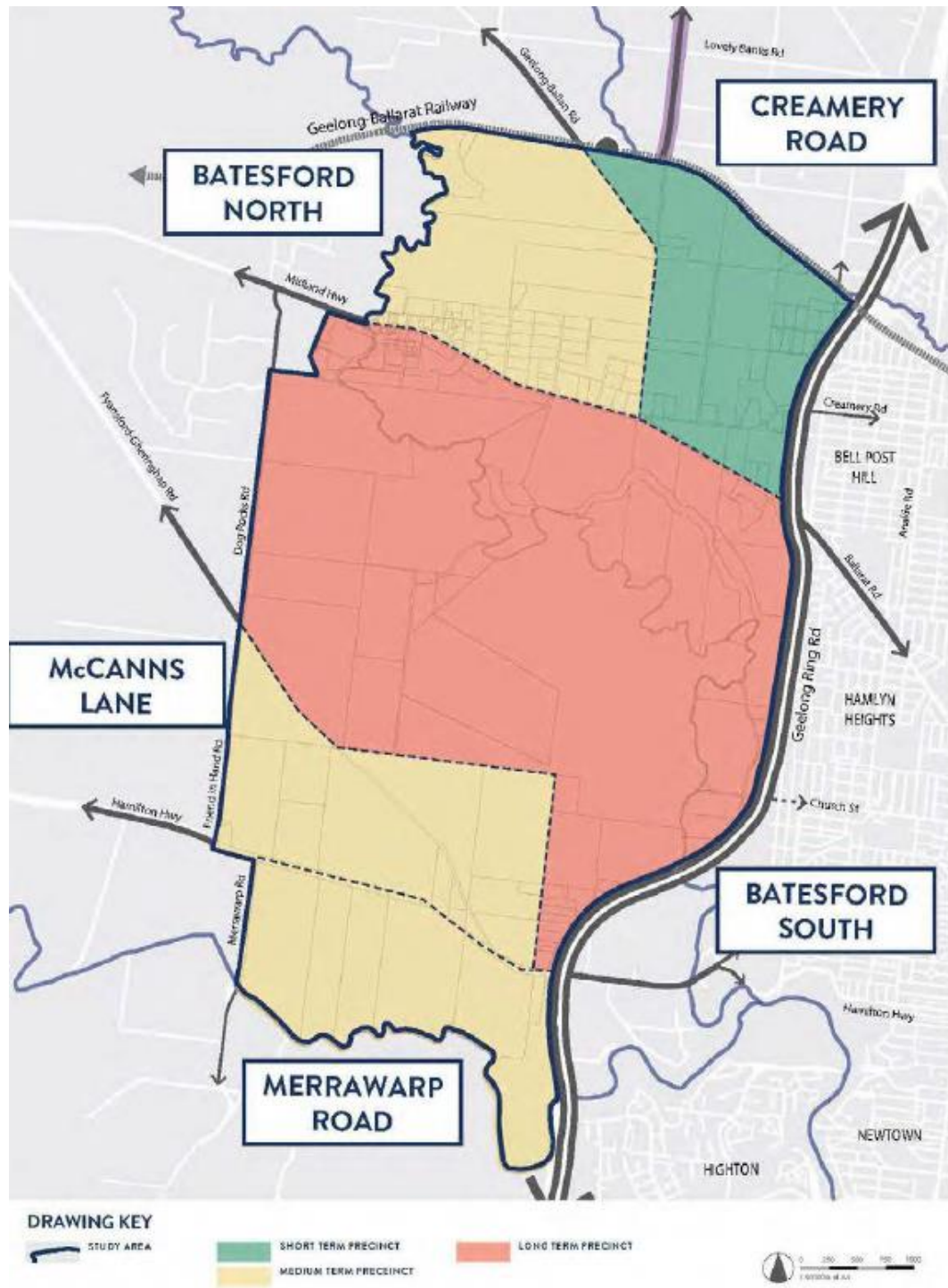


Figure 7 - Western Geelong Growth Area Development Sequencing (NWGGA Framework Plan 2019)

55. The Framework Plan divides the Western Growth Area into five (5) precincts, which are shown below:

Short term precinct:

- *Creamery Road (Figure 8)*

Medium term precinct:

- *Batesford North (Figure 9)*
- *McCanns Lane (Figure 10)*
- *Merrawarp Road (Figure 11)*

Long term precinct:

- *Batesford South (Figure 12)*

56. The 'Delivery' section of the Framework Plan states that:

'urban development in the Western Geelong Growth Area will commence on the land adjoining Bell Post Hill with direct access to central Geelong via Ballarat Road. New neighbourhoods will be established along the Midland Highway and Hamilton Highway corridors in the medium term before urban development is considered in proximity to Batesford Quarry. The Clever and Creative Corridor will be accessible to all precincts.'

57. Additionally,

'Each precinct will accommodate a standalone, neighbourhood-sized community that is sufficient to support local services, easing the short-term precincts will not be dependent on the immediate or premature development of subsequent precincts. The large size and development potential of the Batesford South precinct means that the Western Geelong Growth Area will develop as two separate, smaller growth corridors in the short and medium term with large-scale infrastructure requirements triggered by long-term urban development.'

58. The 'Delivery' section of the Framework Plan also identifies the Infrastructure Requirements of each of the Precinct Structure Plan precincts. This includes Integrated Transport Infrastructure, Waterway Infrastructure and Social Infrastructure. Some of these infrastructure requirements are required to support multiple precincts, such as the proposed 'Clever and Creative Corridor'.

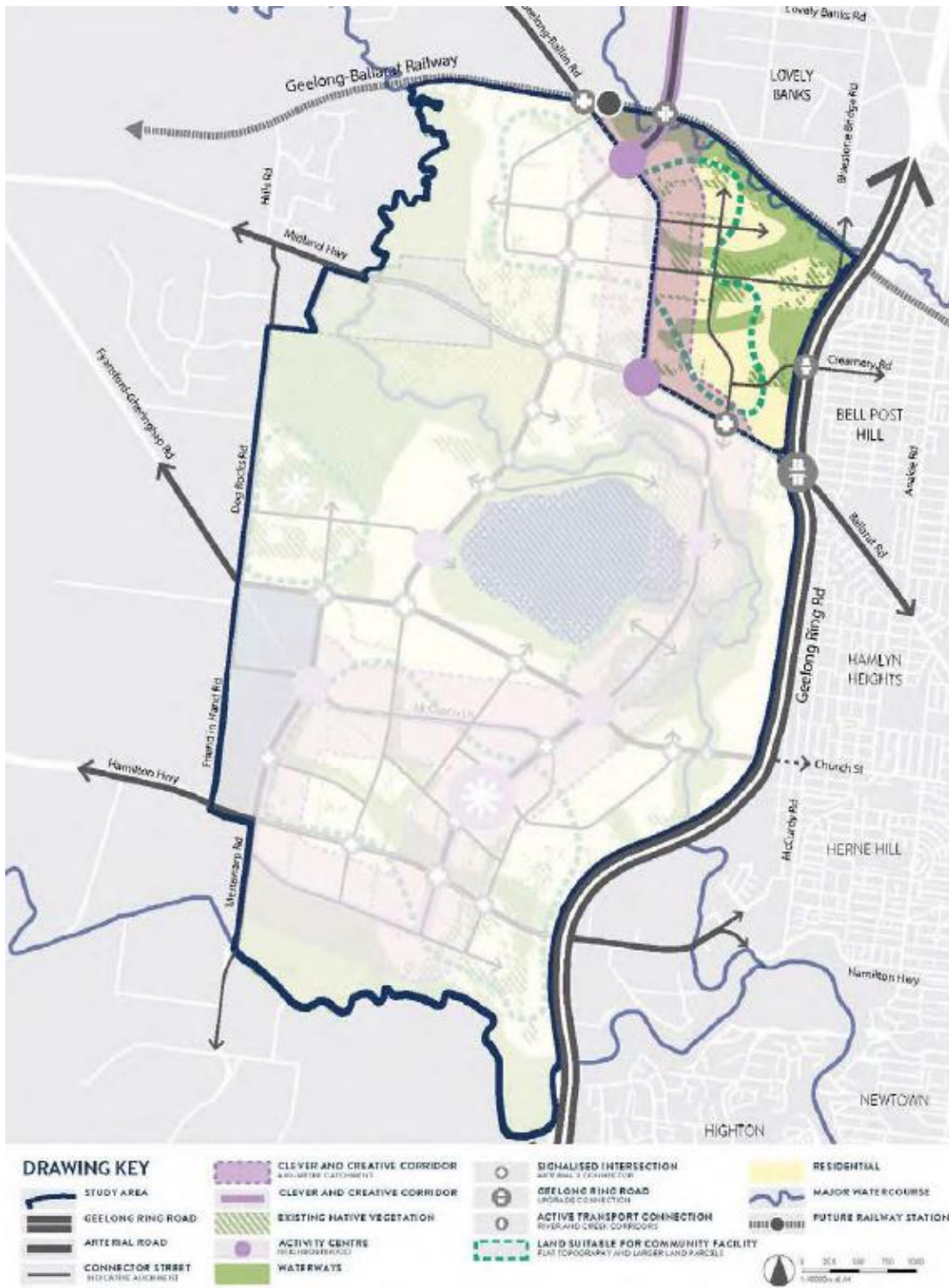


Figure 8 - Creamery Road Precinct (NWGGA Framework Plan 2019)

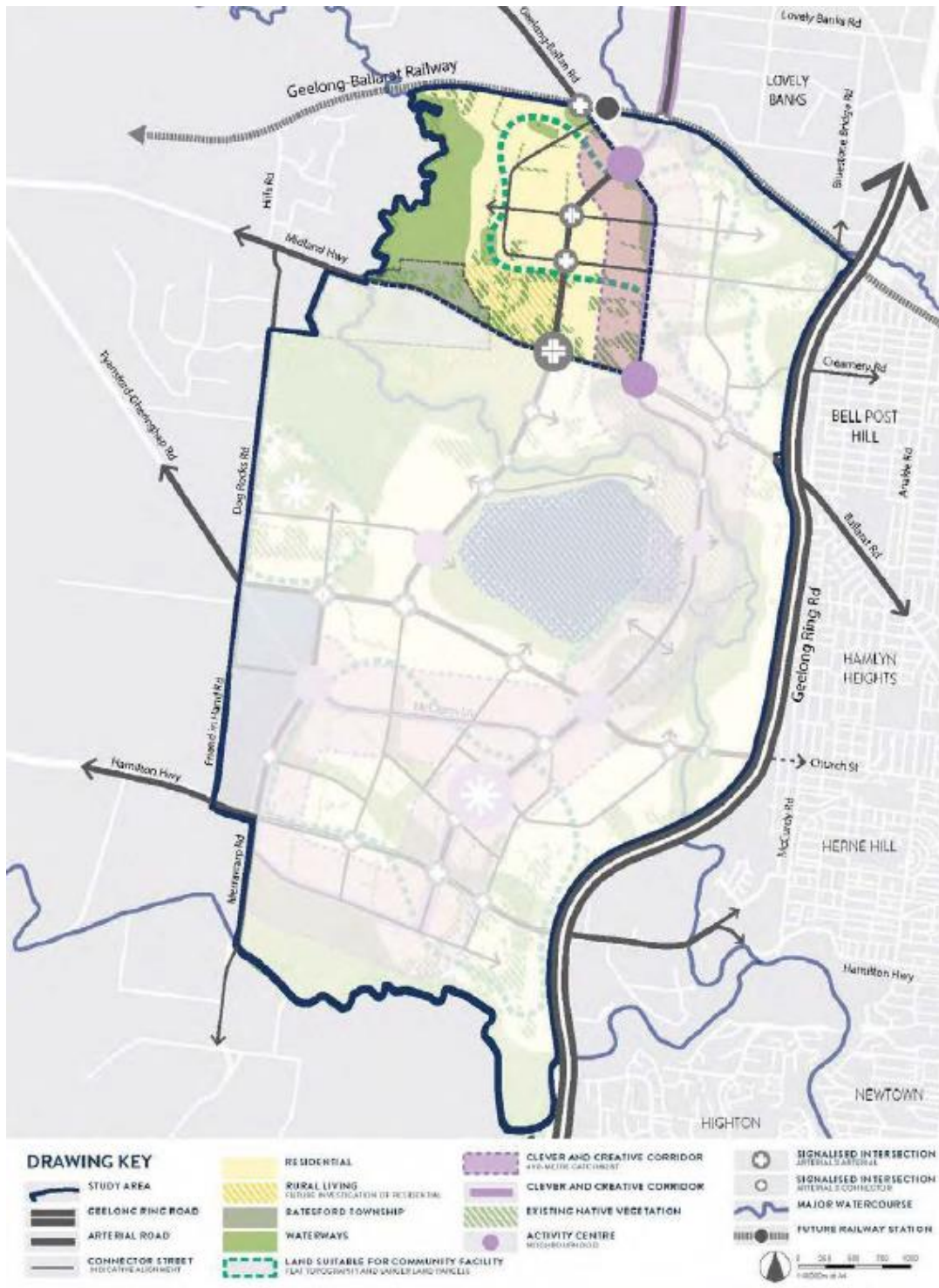


Figure 9 - Batesford North Precinct (NWGGA Framework Plan 2019)

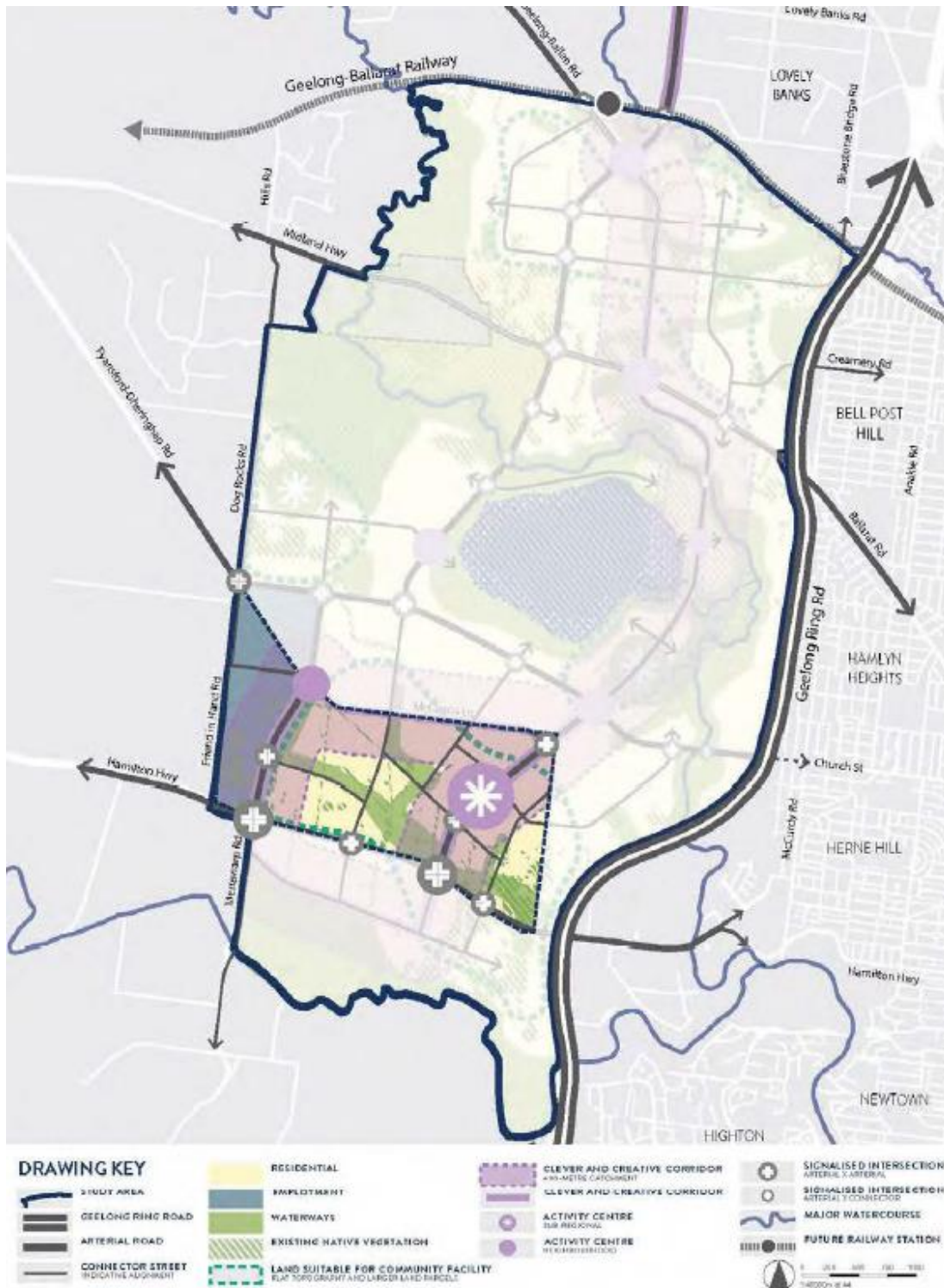


Figure 10 - McCanns Lane Precinct (NWGGA Framework Plan 2019)

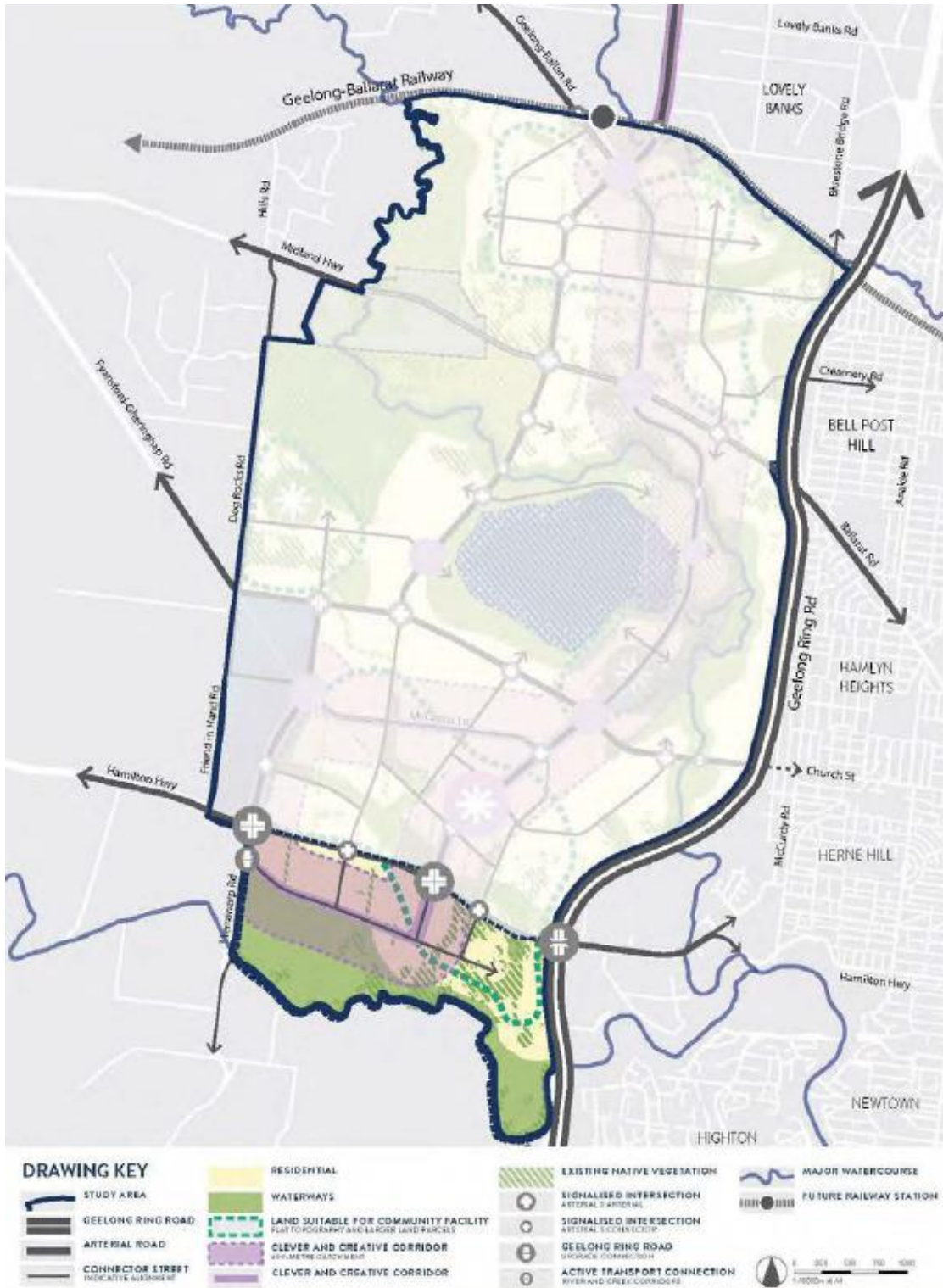


Figure 11 - Merrawarp Road Precinct (NWGA Framework Plan 2019)

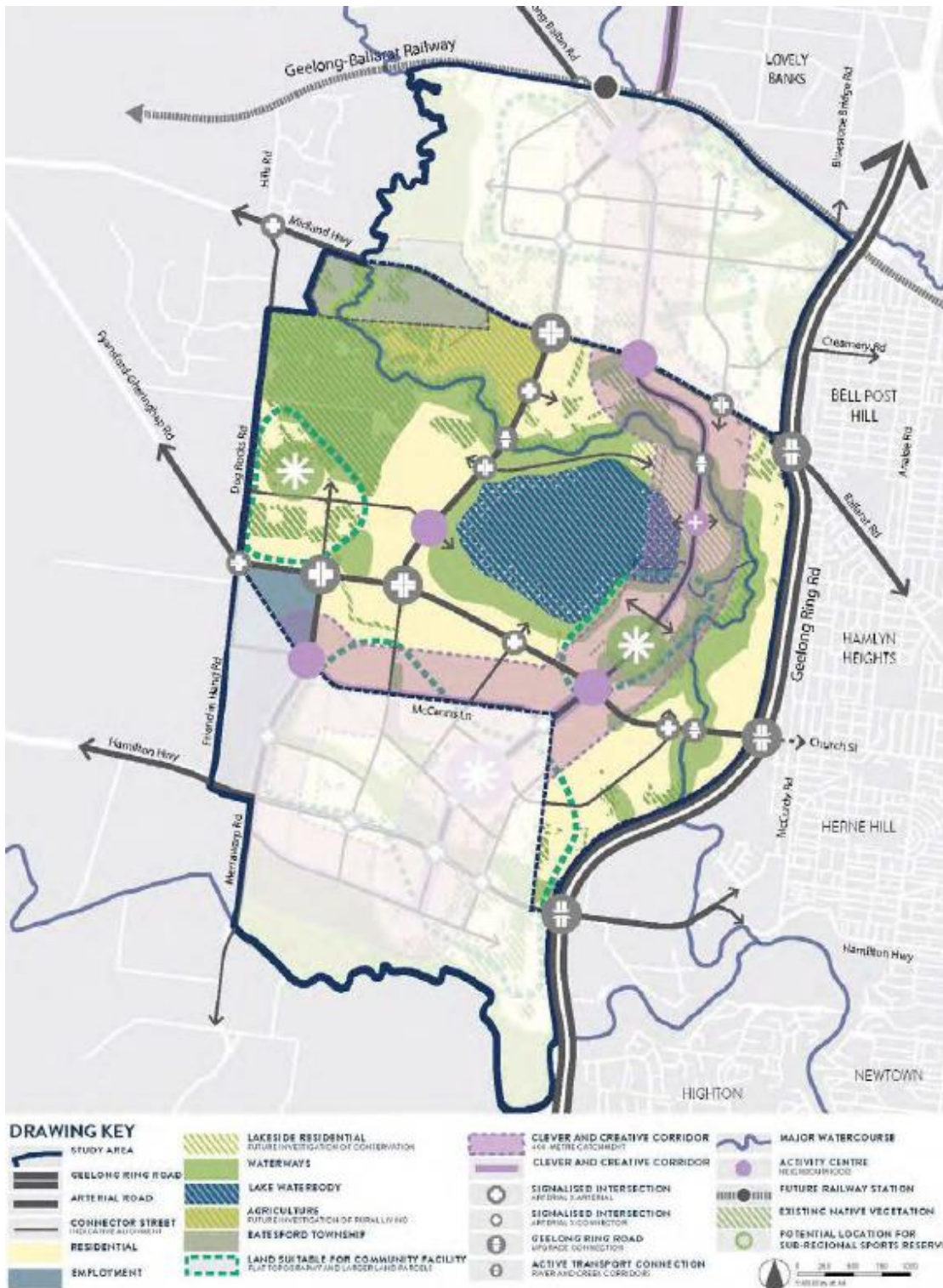


Figure 12 - Batesford South Precinct (NWGGA Framework Plan 2019)

5 PLANNING SCHEME AMENDMENT

59. The *Explanatory Report* accompanying the Amendment documentation prepared by the City of Greater Geelong states that:

“The Amendment proposes to implement the City of Greater Geelong’s Settlement Strategy (2018) and Northern and Western Geelong Growth Areas Framework Plan (2019). 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”.

60. Specifically, in relation to the subject land, 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
- Insert a new Clause 21.20 Northern and Western Geelong Growth Area 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 Zone to Urban Growth Zone

61. The Explanatory Report states that the amendment is required in order to:

“implement the Northern and Western Geelong Growth Areas Framework Plan (2019) for the largest greenfield planning project in regional Victoria with the capacity to accommodate 110,000 new Geelong residents. Introduction of the Framework Plan and associated policy into the Planning Scheme will ensure that development is facilitated in a sequenced and orderly manner. The new policies and Framework Plan will guide the preparation of nine Precinct Structure Plans and Development Contributions Plans which will be prepared in a staged manner and implemented through further planning scheme amendments.”

62. The Explanatory Report outlines how the Amendment will provide for a number of improved environmental, social and economic outcomes:

“The Northern and Western Geelong Growth Areas Framework Plan is based on a series of expert technical reports and assessments covering issues such as flora and fauna, stormwater management, integrated water cycle

management, cultural heritage, groundwater, geotechnical and soils. As a result, the plan recognises environmental constraints and guides development to ensure environment impacts are managed. Environmentally sustainable development (ESD) principles are being applied and there is a policy to design urban development in the Northern and Western Geelong Growth Areas to achieve carbon neutral neighbourhoods. The Amendment through proposed Clause 21.20 includes a strategy to undertake detailed master planning for the Moorabool River, Barwon River and Cowles Creek corridors to integrate protection and enhancement of natural flows and biodiversity and cultural heritage values with the urban landscape and recreational use.”

63. Furthermore, the Explanatory Report states:

“The Settlement Strategy was informed by expert land supply, housing, demographic and population research and analysis. The strategy addresses municipal housing needs until 2036. This meets the requirement of the State Planning Policy Framework that all Victorian councils must plan to accommodate projected population growth over a 15-year period. The amendment introduces new policy objectives at Clause 21.06, 21.08 and 21.14 that will have positive social and economic effects including:

- Contain growth within identified locations across the municipality*
- Increase the level of affordable and social housing*
- Minimise the economic, environmental, visual and servicing impacts of residential development on rural areas*
- Maintain the unique identity of Greater Geelong and its townships*
- Promote the early provision of public transport infrastructure and services in all growth areas*
- Manage the release of new growth areas to efficiently deliver infrastructure, services and facilities*

64. Additionally:

The Northern and Western Geelong Growth Areas Framework Plan was informed by a number of technical reports including social infrastructure, retail and activity centre analysis and transport strategies. The implementation of the Framework Plan through a new Clause 21.20 includes the following positive social and economic objectives:

- Create neighbourhoods where residents can live locally and meet most of their everyday needs within a 20-minute walk, cycle or local public transport trip of their home*
- Provide a network of activity centres in the Northern and Western Geelong Growth Areas that provide employment, retail, commercial, entertainment and community uses for growth area residents without adversely impacting the broader Geelong activity centre network.*
- Develop a Clever and Connected Corridor as a fundamental design element of the Northern and Western Geelong Growth Areas to ensure development is sustainable, self-sufficient, distinctive and connected through varied transport options.”*

5.1 PROPOSED CHANGES TO THE PLANNING SCHEME – AMENDMENT C395

65. The following are the key local planning policies changes proposed by Amendment C395 to the Greater Geelong Planning Scheme.

66. **Clause 21.03 Objectives – Strategies – Implementation** is to be amended to include *Northern and Western Geelong Growth Areas (Clause 21.20)* within places and towns contained in the Place-based Planning Framework.
67. **Clause 21.04 Municipal Framework Plan** is to be replaced with a new Clause 21.04 in order to replace the previous Municipal Framework Plan with an updated Municipal Framework Plan which implements the *Settlement Strategy 2018* and identifies the Northern and Western Growth Areas.
68. **Clause 21.06 Settlement and Housing** is to be amended by replacing the objectives, strategies and references contained within the clause to implement the *Settlement Strategy*. Key new strategies relevant to the subject land include:
- *Direct the majority of future housing needs to urban Geelong (urban infill, Armstrong Creek and the Northern and Western Geelong Growth Areas)*
 - *Ensure new development is guided by a strategic framework plan that outlines the orderly and sequential preparation precinct structure plans*
 - *Limit the number of precinct structure plans that can be prepared simultaneously*
69. The amendment also updates the Further Work section of the clause, with new actions including:
- *Prepare Precinct Structure Plans for the Northern and Western Geelong Growth Areas*
70. The amended clause will also include the *City of Greater Geelong Settlement Strategy (City of Greater Geelong, October 2018)* as a reference document, and incorporates an updated Housing and Settlement Framework Plan which implements the *Settlement Strategy*.
71. **Clause 21.08 Development and Community Infrastructure** is to be amended to update strategies on Transport and Development Contributions to implement the *Settlement Strategy*. Key new and updated strategies relevant to the subject land include:
- *Ensure that development levies applied in the growth areas adequately caters for local infrastructure to support the metropolitan-equivalent dwelling density and population yield*
 - *Explore opportunities to use private sector funding to assist with delivering infrastructure*
 - *Ensure development proceeds in a logical, sequenced manner which maximises the efficient delivery and use of development and community infrastructure*
 - *Prepare Infrastructure Contribution Plans and Development Contribution Plans in designated growth areas across the municipality*
72. The amended clause will also include the *City of Greater Geelong Settlement Strategy (City of Greater Geelong, October 2018)* as a reference document.
73. **Clause 21.20 Northern and Western Geelong Growth Areas** is to be inserted into the Planning Scheme, and will include new objectives, strategies, references and plans to implement the *Northern and Western Geelong Growth Areas Framework Plan*. Key new strategies relevant to the subject land include:

- *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*

74. The schedule to **Clause 72.08 Background Documents** is to be amended to include the *City of Greater Geelong Settlement Strategy (City of Greater Geelong, October 2018)* and the *Northern and Western Geelong Growth Areas Framework Plan (City of Greater Geelong, March 2019)* as background documents.

5.2 URBAN GROWTH ZONE

75. The Purpose of the Urban Growth zone is:

- *To implement the Municipal Planning Strategy and the Planning Policy Framework.*
- *To manage the transition of non-urban land into urban land in accordance with a precinct structure plan*
- *To provide for a range of uses and the development of land generally in accordance with a precinct structure plan*
- *To contain urban use and development to areas identified for urban development in accordance with a precinct structure plan occurs*
- *To ensure that, before a precinct structure plan is applied, the use and development of land does not prejudice the future urban use and development of land*

76. The application of the Urban Growth zone will ensure that precinct structure plans are prepared for the Northern and Western Geelong Growth Areas.

77. The Urban Growth zone has been used across Melbourne's growth areas and in a number of regional growth areas.

6 PLANNING REVIEW

78. *The Amendment proposes to implement the City of Greater Geelong's Settlement Strategy (2018) and Northern and Western Geelong Growth Areas Framework Plan (2019).*
79. The purpose of the Settlement Strategy (amongst other things) is to develop a clear policy framework that will guide planning and decision-making.
80. The Managing Future Growth section of the Settlement Strategy provides a reference to the role the new Growth Areas will play in supporting the future growth of the City of Greater Geelong.
81. The *Western Geelong Growth Areas Framework Plan* (Framework Plan) is extremely detailed and in many parts the detail is more akin to what would be provided within a Precinct Structure Plan.
82. Notwithstanding the matters raised below, it is a recognised approach to prepare a Framework Plan that provides guidance to the preparation of future precinct structure plans. This strategic approach has been applied to Melbourne's growth areas and has been relatively effective.
83. Furthermore, the inclusion of an overall Framework Plan map, derived from the City of Greater Geelong Settlement Strategy, is a reasonable way to embed the Framework Plan in the Planning Scheme.
84. For the reasons outlined above, I support the approval of Amendment C395 to the Greater Geelong Planning Scheme, subject to some changes to the *Western Geelong Growth Areas Framework Plan* and associated local planning policies.

6.1 CITY OF GREATER GEELONG SETTLEMENT STRATEGY

85. Page 69 of the Strategy (Managing Future Growth) specifically discusses the planning for the new Growth Areas and the preparation of the Framework Plans.
86. The Strategy states that *'Once completed and adopted, the framework plan for these areas will provide overarching principles for land use and development. This will guide the preparation of more localised precinct structure plans and infrastructure contributions plans'*.
87. The Strategy states that more localised precinct structure plans will be prepared and *'Each precinct structure plan will be complemented by an infrastructure contributions plan'*.
88. This planning approach is articulated in the Framework Plan (discussed below) where there are five (5) precinct structure plan areas identified.
89. Whilst there is some benefit in preparing a number of precinct structure plans across the Western Growth Area, particularly given a large area of the growth area requires remediation of an existing quarry, I believe the delivery of large scale key enabling infrastructure, such as the Clever and Creative Corridor, would be better achieved if a single development contributions plan was applied to the growth area.

90. Therefore, it is recommended that the Managing Future Growth section of the Settlement Strategy be revised to direct the preparation of a 'single development contributions plan or infrastructure contributions plan'.

91. To this end, it is understood that council in their response to submissions suggest including a new direction on Page 71 of the Settlement Strategy that states:

'Ensure infrastructure funding strategies recognise items that deliver high level infrastructure that benefit multiple PSP areas will require a contribution'.

92. Whilst this additional direction goes someway to recognizing that there are large scale projects that benefit multiple precincts within the growth areas, I believe the directions should be clearer and more specific.

93. It is recommended that the following Direction be included on Page 71 of the Settlement Strategy:

'Prepare a Development Contributions Plan for the Western Geelong Growth Area'.

6.2 WESTERN GEELONG GROWTH AREAS FRAMEWORK PLAN

94. It is proposed that the Framework Plan *Planning Practice Note 13, Incorporated and Background Documents, September 2018*

This practice note:

- *explains the role of external documents in planning schemes*
- *explains the difference between incorporated documents and background documents*
- *provides guidance on when a document should be incorporated or be a background document.*

95. The Amendment proposes to include the Framework Plan in the schedule to Clause 72.08 – Background Documents.

96. The Practice Note highlights that *'The decision to incorporate or refer to a document in the planning scheme should be based on the role the document plays in decision making and the way in which the document will be used or relied upon'.*

97. Background documents provide information to assist in understanding the context within which a particular policy or provision has been framed. Different types of document may perform this role. They may be wide-ranging in their content and contain information not directly relevant to specific decisions under the planning scheme.

98. The Practice Note states that a *'Background documents can be mentioned in the planning scheme in a state standard provision, or be introduced through a local provision'.* In this case, the proposed new local policy Clause 21.20-3 – Strategies, mentions the Framework Plan.

99. Specifically mentioning the Framework Plan in this way is consistent with the direction set in the Practice Note (i.e. mentioned in a local planning provision), however the way in which it is mentioned is questionable.

100. The Practice Note identifies that Background Documents can be used in a number of ways. *'They can be used as a basis for preparing the Municipal Planning Strategy (MPS), local planning policies or requirements in the planning scheme, or can be mentioned in the planning scheme as a source of useful background information to a policy or control'*.
101. Importantly, it is noted that *'Background 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'*.
102. Therefore, the Strategy to *'Ensure land use and development proceeds generally in accordance with the Northern and Western Geelong Growth Areas Framework Plan'* is not appropriate as it seemingly places too much reliance on the role the Framework Plan will play in future decision making.
103. Suggested drafting changes to this Strategy are discussed below but in essence the Framework Plan should be used as a 'guide' to prepare precinct structure plans not as a direction on how future land use and development is to proceed.
104. Additionally, the Framework Plan, in parts, is extremely detailed. For example, Plan 37 – Integrated Transport map shows a level of detailed that would be expected in a precinct structure plan, including Connector Roads in specific locations and many of the listed Actions require very precise things to occur.
105. At this stage in the planning process it is not possible to identify the exact locations of connector streets and realistically won't be possible until further detailed planning is undertaken.
106. Therefore, it is recommended that the level of detail shown on the Framework Plan maps be reviewed so that the information shown is more relevant to the status of the Framework Plan as a Background Document.
107. Given the Framework Plan requires a significant level of further planning assessment and analysis to occur, including the preparation of a number of precinct structure plans, I support the categorization of the Framework Plan as a Background Document that is referred to in the Clause 21.20 and is used to guide future planning activities.

6.2.1 Development Sequencing

108. The Western Geelong Growth Areas Framework Plan is to be referenced in the Planning Scheme as a 'Background Document' in the Schedule to Clause 72.08.
109. Clause 72.08 - Background Documents, provides clarity as to the status of a Background Document by stating that:

The documents listed in the table and the schedule to this clause are background documents. The table and the schedule to this clause must specify the amendment that listed the background document and may specify the clause of this planning scheme that the background document relates to. A background document may:

- *Have informed the preparation of, or an amendment to, this planning scheme.* (Emphasis added)
- *Provide information to explain the context within which a provision has been framed.*
- *Assist the understanding of this planning scheme.*

A background document does not form part of this planning scheme. (Emphasis added)

A background document may be referenced elsewhere in this planning scheme without being listed in the table or schedule to this clause.'

110. The Framework Plan (amongst other things) outlines a short, medium and long-term sequencing approach to delivering five (5) precinct structure plans and development contribution plans across an area of 3,241 hectares.

111. Plan 46 – Development Sequencing, identifies the land in the north east part of the precinct as 'short term' and the large area including and surrounding the quarry as 'long term'. The balance of the growth area is broken up into three (3) precincts that are to be delivered in the medium term.

112. It is understood that the sequencing of the large central area as 'long term' relates to the existing use of the land as a quarry and the rehabilitation works required to occur over time before the land can be reasonably developed.

113. The approach to staging around existing uses is consistent with the approach applied to other growth areas.

114. However, the differentiation between the short and medium-term precincts is less obvious. Whilst it is understood that the area in the north west part of the growth area (Creamery Road precinct) may have existing utility services within general proximity of the precinct it is not uncommon for new development areas to establish connections to new or existing infrastructure which may be some distance away.

115. The staging of precincts should not be purely linked to whether utility services are in immediate proximity to the precinct.

116. Further, Action 5.2.2 of the Framework Plan states:

'Simultaneous preparation of precinct structure plans in the Western Geelong Growth Area will be not be supported unless necessitated by the City's strategic policy and considerations outlined in Action W5.2.1'.

117. Action 5.2.1 states:

'The commencement of any precinct structure plan will be initiated by the City based on strategic policy and budgeting.

Recommendations for the commencement of a precinct structure plan will be based on:

- *The City's Settlement Strategy*
- *Maintaining an adequate supply of residential land*
- *Sequencing proposed in the Northern and Western Geelong Growth Areas Framework Plan*
- *The capacity for urban development in the precinct to meet the community aspirations, one planet principles and project objectives*
- *Executing individual third-party funding agreements with land developers that is sufficient to undertake technical studies.'*

118. These actions highlight further concern about the future process of determining when a new development area can be planned and developed as many of the matters outlined are subjective and open to interpretation.

119. Limiting development to a single precinct has a number of broader impacts on the development of an area, including:

- Restricting land supply to market
- Restricting competition
- Restricting housing options
- Increases the price of new housing

120. Whilst it is understood that the City of Greater Geelong traditionally placed a heavy reliance on land supply reviews as the guide to their strategic planning, the introduction of these new large growth areas requires that a broader approach to facilitating development be taken. That is, the new growth areas should be planned and opened up as soon as possible so as to have the desired effect of stimulating substantial development within the three (3) growth areas and slow growth in other areas (over time).

121. A key objective of the City of Greater Geelong Settlement Strategy is to capture growth from Melbourne's expanding western growth area and hence a 2.5% growth rate has been applied.

122. However, this level of growth is not necessarily supported by only focusing planning activities on one precinct at a time and would be better achieved by planning multiple precincts and encouraging the concurrent development of numerous growth fronts.

123. The funding and delivery of key infrastructure is also enhanced by allowing multiple precinct structure plan areas to develop at once.

6.2.2 Infrastructure Funding and Delivery

124. In the absence of regional Infrastructure Contributions Plan levy, a single Development Contributions Plan should be prepared for the Western Growth Area.

125. The early funding of key enabling infrastructure, such as a road link or upgrade, can be critical to the successful delivery of a new development front. However, in many cases a key infrastructure project can be extremely expensive and often cost prohibitive for a precinct to fund or plays a broader role in supporting growth across a broader area.

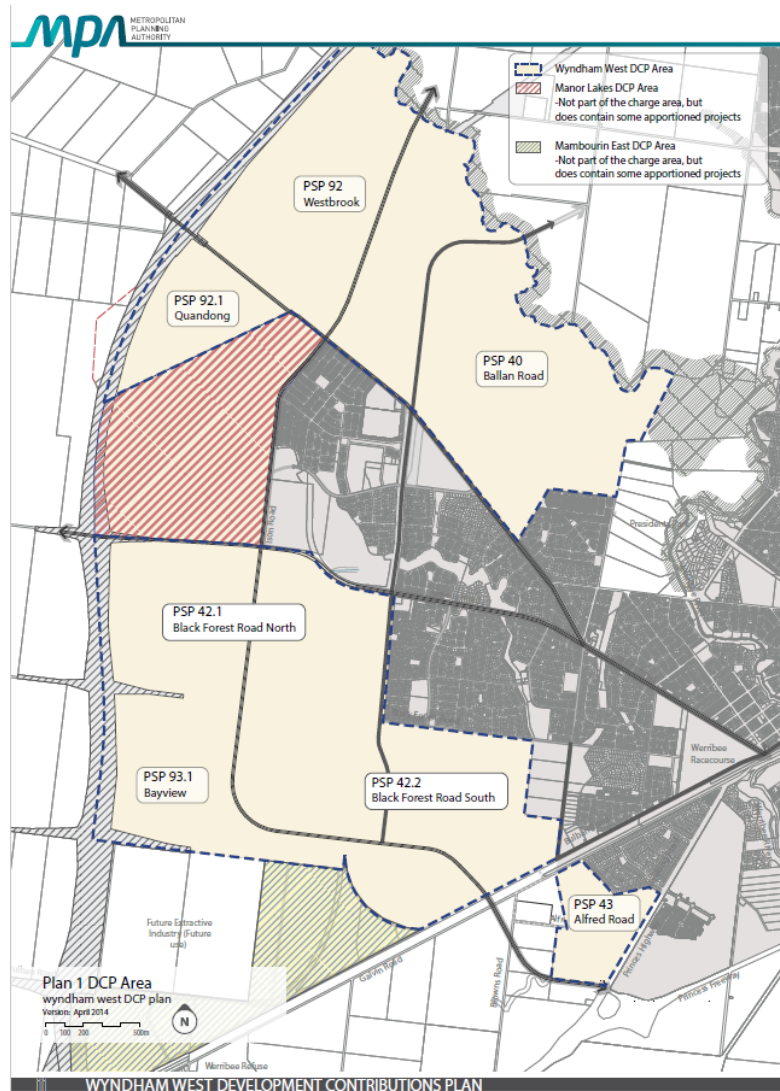
126. For example, the delivery of Ison Road in the Wyndham West Growth Area is a key infrastructure project that must be delivered in order to support the growth of that area.

127. The plan below shows the alignment of Ison Road and the role it plays in connecting the whole Wyndham West growth area to the Princes Highway in the south. Without this road connection all new traffic would be required to link to the existing road network which would be unsustainable.

128. However, as Ison Road will extend across the boundary of multiple precinct structure plan areas the funding of Ison Road should to be coordinated to ensure the priority of delivering Ison Road is maintained across the growth area. In simple terms, the development contributions test of 'need, nexus and apportionment' applies to this large-scale road project and therefore all areas should be contributing to its early delivery.

129. The *Wyndham West Development Contributions Plan* achieves this coordinated funding outcome by clearly articulating Ison Road as the key priority for which all precincts must contribute towards before other infrastructure is funded as it provides a vital entry / exit point for all precincts.

130. Importantly, planning in the Wyndham West growth area has not been limited or constrained to a single precinct and thus development contributions are being collected from a number of development fronts, which is allowing for the faster delivery of Ison Road by channeling funding towards the numerous individual projects that must be delivered across its length.



131. In the Geelong’s western growth area there appears to be similar projects to Ison Road that extend over numerous precincts or key connection points that support numerous precincts (E.g. Church Street connections and the Clever and Creative Corridor), that should be delivered early in the development process and / or funded by the broader development areas.

132. Like the Wyndham West Growth Area, coordinating funding from numerous developments across the Western Geelong Growth Area should be supported and therefore an integrated infrastructure funding approach rather than individual development contributions plans for each precinct structure plan area should be applied.

133. The Wyndham West Development Contributions Plan applies to a net developable area of approximately 1720 hectare across seven (7) precincts and therefore allows for a significant capture of development contributions (approx. \$470,000,000).
134. This level of funding allows for significant contributions towards the new arterial road network, including some bridges, and significant land acquisition.
135. The Geelong Western Growth Area is estimated to have a net developable area of 1,864 hectares across five (5) precincts which could generate a similar level of funding (in excess of \$500m) contributions to Wyndham West if the Melbourne's growth areas development levy rate is applied.
136. Assuming a coordinated approach is applied to the 'Infrastructure Requirements' outlined in the Delivery section of the Framework Plan, this level of contribution will assist greatly in funding the required infrastructure.
137. However, given the cost of key enabling infrastructure projects, dispersed nature of the infrastructure and the land acquisition requirements, the implementation of the Framework Plan and ultimately the precinct structure plans will be greatly enhanced if there is a single (global) Development Contributions Plan applied to the Geelong western growth area.
138. Alternatively, the introduction of a Regional Infrastructure Contributions Plan (ICP) levy would also assist with the significant pooling of funds that could be directed to key projects in the same way as a global development contributions plan.
139. However, given a Regional ICP is yet to be established I have focused on the DCP regime, albeit that both systems require that a list of infrastructure items that are needed to support the future land use and development is established.
140. The delivery of the 'Clever and Creative Corridor', upgrades of existing roads that will service the precinct, the creation of the Church Street link and the provision of key open spaces across the growth area will service the whole growth area and will be greatly supported through the establishment of a single DCP or a set ICP levy.
141. Like the Wyndham West example, the DCP or ICP can set the infrastructure priorities based on a larger area and most importantly coordinate the delivery of large projects that spread across a number of precincts.
142. At this stage, it is understood that DELWP and the VPA are working on a policy to prepare ICPs in a regional growth area setting, such as Geelong. However, it is noted that the introduction of ICPs occurred in 2016 and only recently was the Melbourne metropolitan growth areas ICP established.
143. Therefore, whilst I support the introduction of a regional growth area ICP it is important that in the event that the implementation of the regional ICP is delayed then Settlement Strategy, Framework Plan and local policies should provide for the preparation of a single DCP for each of the Northern and Western Growth Areas.
144. This approach is consistent with the approach applied to Wyndham's west and north growth areas.
145. In order to enhance the importance of having a coordinated funding approach to infrastructure delivery and allow for multiple development fronts to occur at once I recommend the following:

- Action 5.2.1 of the Framework Plan should be amended to include the following words:
'The commencement of any precinct structure plan will be initiated by the City based on strategic policy, budgeting and to support the delivery of key infrastructure delivery.'
- Action W5.2.3 should be deleted from the Framework Plan as it is unnecessarily restrictive and will impact the delivery of key enabling infrastructure.

6.3 LOCAL PLANNING POLICIES

146. The Amendment includes the introduction of a new planning policy (Clause 21.20 – Northern and Western Geelong growth Areas) and changes to a number of planning policies, including Clause 21.06 – Settlement and Housing and Clause 21.08 – Development and Community Infrastructure.

6.3.1 Settlement and Housing (Clause 21.06)

147. This clause is to be amended by replacing the objectives, strategies and references contained within the clause to implement the *Settlement Strategy*. Generally, I support the proposed changes to the Clause 21.06 however Clause 21.06-3 – Managing Future Growth, includes the following Strategies which I believe will unnecessarily constrain the development of the new growth areas:

- *Ensure new development is guided by a strategic framework plan that outlines the orderly and sequential preparation precinct structure plans*
- *Limit the number of precinct structure plans that can be prepared simultaneously*

148. These Strategies promote a linear approach to planning the growth areas that appears to be driven by council's resource management rather than being focused on delivering the new communities.

149. There are examples within all Melbourne's growth areas where multiple precinct structure plans are being prepared concurrently, including the Wyndham West example sited previously.

150. For the reasons outlined in Section 6.1 above, it is recommended that these Strategies be deleted from the proposed Clause 21.06-3.

6.3.2 Development and Community Infrastructure (Clause 21.08)

151. The changes to this Clause are generally supported however it is recommended that a single (global) development contributions plan applies to the western growth area.

152. For the reasons outlined previously the cost of key infrastructure, such as the Church Street connection (approx. \$50m) or various bridges, which benefit all precinct within the growth area should be shared.

153. In the absence of a Regional Infrastructure Contributions Plan (ICP) levy, a global development contributions plan approach is appropriate.

154. It is recommended that the 'Further Work' section of Clause 21.08 be amended to include the following:

- *'Prepare a Development Contributions Plan for the Northern and Western Geelong Growth Areas'.*

6.3.3 Northern and Western Geelong Growth Areas (Clause 21.20)

155. The Amendment proposes to introduce this new Clause into the Planning Scheme.

156. The inclusion of this Clause in the Planning Scheme is generally supported however the re-wording of some of the Strategies in Clause 21.20-3 is necessary to ensure some flexibility is provided for in the future planning of the growth areas.

157. Specifically, the following Strategies require amending:

- *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*

158. As outlined in Section 6.1 above, the linear approach to planning and development that is proposed in the Framework Plan report runs the risk of unintendedly constraining development in the growth areas, when the general policy intent is to direct a greater level of the municipal growth to the new growth areas.

159. Furthermore, the Framework Plan report seeks to guide development for a 20-30 year period during which time there will be significant changes to land use and development practices that could reasonably impact the way the land develops.

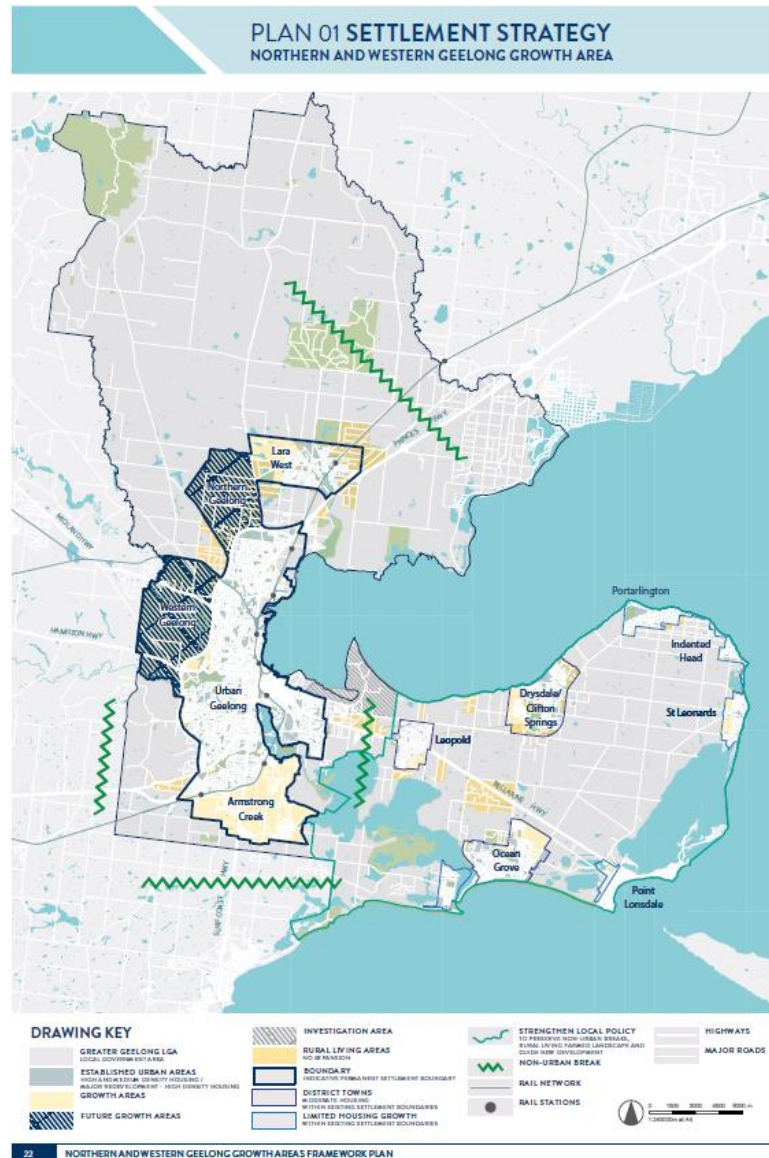
160. Clause 21.20-1 – Overview, references the Framework Plan map shown in Clause 21.20-5 as a means of delineating the area where the policy applies.

161. Clause 21.20-3 – Strategies, does not specifically reference the map but references the Framework Plan, which assumingly means the entire Framework Plan report.

162. If the intention of the Framework Plan map is to simply identify the area in which the policy applies, then the map should be replaced with a simpler map that shows the growth areas but has no internal detail. For example, Plan 1 of the Framework Plan shown below.

163. Conversely, if the intention of the Strategy statement is to ensure that land use and development proceeds generally in accordance with the Framework Plan map then this should be specifically stated and the map at Clause 21.20-5 is appropriate.

164. However, the detail shown on this map is far too detailed and should be revised.



165. The Framework Plan map should be a 'guide' to how land use and development occurs rather than requiring that land use and development proceeds *'generally in accordance with the Northern and Western Geelong Growth Areas'* (emphasis added).

166. The term 'generally in accordance with' has been at the centre of many debates and with a simple rewording of the Strategies could be avoided.

167. Ultimately, the Framework Plan should provide a high-level strategy for how a growth area should develop in the coming decades by identifying broad transport networks and land use areas whereby a Precinct Structure Plan should provide guidance on the integrated planning of new urban areas in greenfield locations.

168. However, Clause 21.20-5 - *Northern and Western Geelong Growth Area Framework Plan map*, contains significantly more detail than what would be typically expected (E.g. connector street) and therefore expecting land that may be developed in 20-years time to be 'generally in accordance with' the Framework Plan and / or the Framework Plan map is unreasonable.

169. It is recommended that the Strategies outlined above are reworded as follows:

- *Prepare Precinct Structure Plans that are guided by the Northern and Western Geelong Growth Areas Framework Plan map*

170. The second of the Strategies listed above should be deleted as it unreasonably constrains future development and key infrastructure funding.

171. It is recommended that the 'Further Work' section of Clause 21.20 be amended to include the following:

- *Prepare a single Development Contributions Plan for each of the Northern and Western Growth Areas*
- *Prepare Precinct Structure Plans for land within the Growth Areas*

7 CONCLUSION

172. Having reviewed the range of documents associated with the Amendment C395 to the Greater Geelong Planning Scheme, I support the approval of the Amendment C395 subject to key changes being made to the *City of Greater Geelong Settlement Strategy*, *Western Geelong Growth Areas Framework Plan* and proposed *Clause 21.20 – Northern and Western Geelong Growth Areas* and *Clause 21.06 – Settlement and Housing* that ensures that development within the Western Growth Area can proceed following the preparation of precinct structure plans and a global development contributions plan and ultimately deliver the key infrastructure required to support the ongoing development of the area.

173. The changes outlined in Section 6 of this report will improve the alignment between the Settlement Strategy, framework planning and precinct structure planning processes and ensures that the local planning policies assist in facilitating development.

174. The following inclusion to the Directions set out on Page 71 of the *City of Greater Geelong Settlement Strategy* are recommended:

- *‘Prepare a Development Contributions Plan for the Western Geelong Growth Area’.*

175. The following changes to the *Western Geelong Growth Areas Framework Plan* are recommended:

- Amend Action 5.2.1 of the Framework Plan to include the following words:

The commencement of any precinct structure plan will be initiated by the City based on strategic policy, budgeting and to support the delivery of key infrastructure delivery.

- Delete Action W5.2.3 from the Framework Plan.

176. The following changes to the relevant Local Planning Policies are suggested:

Clause 21.06 – Settlement and Housing

- Amend the Strategies by deleting:
 - *Ensure new development is guided by a strategic framework plan that outlines the orderly and sequential preparation precinct structure plans*
 - *Limit the number of precinct structure plans that can be prepared simultaneously*

Clause 21.08 – Development and Community Infrastructure

- Amend the ‘Further Work’ section to include:
 - *Prepare a Development Contributions Plan for the Northern and Western Geelong Growth Areas.*

Clause 21.20 – Northern and Western Growth Areas Framework Plan

- Amend the Strategies by deleting:

- *Ensure land use and development proceeds generally in accordance with the Northern and Western Geelong Growth Areas Framework Plan*
- Amend the Strategies by amending the second point:
 - *Develop Precinct Structure Plans that are guided by the Northern and Western Geelong Growth Areas Framework Plan*
- Amend the 'Further Work' by including:
 - *Prepare a Development Contributions Plan for each Growth Area*
 - *Prepare Precinct Structure Plans for land within the Growth Areas*

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