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Wednesday 16 January 2013

Committee Secretary
Senate Standing Committees on Environment and Communications
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Senate Standing Committees on Environment and Communications

**RE: ENVIRONMENT PROTECTION AND BIODIVERSITY CONSERVATION
AMENDMENT (RETAINING FEDERAL APPROVAL POWERS) BILL 2012**

I refer to the Bill to amend the *Environment Protection and Biodiversity Conservation Act 1999* to prevent the Commonwealth from handing responsibility for approving proposed actions that significantly impact matters protected under the Act to a State or Territory, and for related purposes.

Local Government has a strong role in the protection of matters listed under the *Environment Protection and Biodiversity Conservation Act 1999*. Hume City Council works with both State and Federal legislation to ensure the best outcomes are achieved for biodiversity through planning and enforcement. Hume City Council also delivers a range of works and programs, including rate rebates and grants for landholders, to protect and enhance our local biodiversity.

Hume City Council's *Natural Heritage Strategy 2011-2015* (encl.) is underpinned by the following principles:

- Natural heritage belongs to everybody
- Natural heritage is valuable to the community
- Natural heritage has intrinsic value
- Natural heritage should be available to current and future generations.

These principles can only be met through rigorous environmental protection laws which are implemented and enforced by all levels of government.

As a growth area Council of Melbourne, Hume City Council has worked with the Victorian State Government in the implementation of the requirements listed under the Melbourne Strategic Impact Assessment Report (MSIAR).

Hume City Council submitted to the Victorian State Government its concerns with the implementation of the MSIAR in the Merri Creek Corridor. Council's Submission to the Growth Corridor Plans (GCP) (encl.) outlined that these plans were being created out of sequence. The draft Biodiversity Conservation Strategy for Melbourne's Growth Areas was not approved by the

Commonwealth Government, as required under the MSIAR, prior to the release of the GCP. Hume City Council objected to the GCPs, and consequently any Precinct Structure Plans within the GCPs, being approved until these issues were amended and the implications worked through.

In addition, Council's Submission to Amendment C161 - Lockerbie Precinct Structure Plan (PSP) (encl.) highlighted the inadequacy of the Biodiversity Assessment Report, including the misclassification of communities listed under the *Environment Protection and Biodiversity Conservation Act 1999*. This report was used to inform the allowance for clearance of native vegetation and biodiversity within the project area.

The ability for all levels of government to influence environmental protection is important to the protection of biodiversity. By retaining Commonwealth environmental protection powers with the Australian Government we can ensure that the best outcomes for threatened species and communities are consistently met across political boundaries. Hume City Council therefore supports the Bill.

Yours Sincerely

**KELVIN WALSH
DIRECTOR CITY SUSTAINABILITY
HUME CITY COUNCIL**

Enclosed

Hume City Council Natural Heritage Strategy 2011-2015

Growth Corridor Plans – Hume City Council Submission - 20 December 2011

Hume City Council Submission: Amendment C161 to the Hume Planning Scheme, Lockerbie Precinct Structure Plan - 23 December 2011



HUME CITY COUNCIL
**NATURAL
HERITAGE
STRATEGY**
2011 – 2015

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IMAGE ACKNOWLEDGEMENTS

Cover (Top Left) – R. Cerezo

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Page 4 – R. Kissel

Page 5 – K. Fowler

Page 6 – R. Kissel

Page 8 – R. Cutts

Page 28 – R. Cerezo

Page 30 – T. Northey

The Natural Heritage Strategy 2011 – 2015 was adopted by Hume City Council on 13 February 2012.

Note: Terms bolded throughout the text in this document are defined in the glossary (Appendix 5)

ACKNOWLEDGEMENTS

We respectfully acknowledge that Hume's natural heritage is located on Country for which the members and Elders of the Gunung-Willam-Bulluk people and their forebears have been custodians for many centuries. The Gunung-Willam-Bulluk of the Wurundjeri are the Traditional Custodians of this land and we pay our respects to Elders past and present.

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1. INTRODUCTION

Hume supports many natural values such as native plants and plant communities, native animals, **waterways** and sites of geological and geomorphological significance. Many of these natural features, such as the ancient River Red Gums of the volcanic plains, are iconic to the Hume landscape and, as such, contribute strongly to Hume's identity. To ensure that these **natural heritage** values are present for future generations, it is important that they be protected and valued by the community.

Achieving Council's mission to '*enhance the social, economic and environmental prosperity of our community through vision, leadership, excellence and inclusion*' includes Council pursuing ecological sustainability. To guide this pursuit, Council adopted its first Natural Heritage Strategy in 2006.

The Natural Heritage Strategy 2006 was a framework for achieving the natural environment objectives of the Hume Plan 2030, the Hume Council Plan and the Environmental Sustainability Framework 2002. The Natural Heritage Strategy 2011 - 2015 (NHS 2011 - 2015) is the first revision of the Natural Heritage Strategy and provides a vehicle for delivering on Council's commitment to the management of natural heritage values over the next four years.

STRUCTURE OF THE NHS 2011 - 2015

Hume's natural heritage is classified in five key themes in this strategy:

1. **Natural Heritage General**
2. **Geology & Geomorphology**
3. **Native Vegetation**
4. **Native Fauna**
5. **Waterways**

The themes are discussed and analysed under the following headings:

- **Setting the Scene:** provides a brief overview of each of the themes in Hume.
- **Opportunities for Enhancement:** outlines the opportunities for Council to address key threats to each theme and improve their management.

The NHS 2011 - 2015 is accompanied by the following documents:

1. The Natural Heritage Action Plan 2011 – 2015 (Action Plan).
2. The Natural Heritage Background Paper (Background Paper).

The Action Plan prescribes objectives and actions for each key theme, reflecting the roles and ability of Council to:

- **Demonstrate Excellence in Stewardship:** achieving positive natural heritage outcomes through Council's own actions.
- **Foster Community Learning & Action:** the community becoming more aware of natural heritage values and taking positive action to care for and maintain natural heritage assets.
- **Influence & Advocate:** influencing the actions of other organisations and advocating improving resource allocation and the policy and regulatory environment that supports natural heritage.

The Background Paper contains a more detailed description of natural heritage values and the threats and challenges facing them.



AIMS AND GUIDING PRINCIPLES

The aims of the NHS 2011 - 2015 are consistent with *Pathways to Sustainability: an Environmental Framework* (Pathways), Council's strategic document for environmental sustainability in Hume. In line with the objectives of Pathway 3: *Support Community Learning and Action* and Pathway 5: *Provide Strong Environmental Stewardship*, the NHS aims to:

- Protect and enhance ecological health
- Protect and enhance landscape character
- Manage natural assets for the long term
- Provide regulatory protection
- Enable community action

The following principles underpin the NHS 2011 - 2015

1. Natural heritage belongs to everybody

Aligned with the principles of Victoria's Biodiversity Strategy 2010 – 2015: *Biodiversity is Everybody's Business*, Council recognises that all levels of government, businesses, residents and land managers need to take responsibility for the long-term survival and prosperity of natural heritage values in Hume.

2. Natural heritage is valuable to the community

Natural heritage provides the Hume community with many economic, social and ecological benefits, including improved water and air quality, oxygen production, climate regulation, enhanced agricultural production, pest regulation, pollination, nutrient cycling and aesthetic, cultural, spiritual and recreational enjoyment. The value the community places on Natural Heritage was demonstrated in Council's Community Survey 2010/11, where 86.4% of respondents indicated that it was either important or very important that Council protect bushland and grasslands (HCC, 2011).

3. Natural heritage has intrinsic value

All native plants, animals and other organisms that make up Hume's **biodiversity** have a right to coexist with humankind, whether or not they have a benefit to us.

4. Natural heritage should be available to current and future generations

All residents of Hume, including current and future generations, should have access to the same natural heritage values we enjoy today.



SCOPE OF THE NHS 2011 - 2015

The scope of the NHS 2011 - 2015 is defined within the context of Council's roles and responsibilities as a land owner and manager, a planning authority and a facilitator of community education and capacity-building.

Land Ownership and Management

Council is responsible for managing a network of Council-owned conservation reserves within public open space across the municipality (Map 1). Under State and Commonwealth legislation, Council has an obligation to manage these areas and key threats to biodiversity, such as weeds. Council also manages two high conservation Crown Land reserves and a number of conservation areas on municipal rural roadsides. Council also works collaboratively with other public land managers that manage sites that are a part of Hume's conservation estate (Appendix 2).

Planning

In accordance with the *Planning and Environment Act 1987*, Council is responsible for ensuring that all controls which regulate the protection of natural values under the Hume Planning Scheme are implemented via the planning process. Council must also continuously review the Hume Planning Scheme to ensure it adequately protects the environment. Council is also responsible for enforcing the Hume Planning Scheme and taking action to prevent and enforce against illegal works or development which negatively impact on Hume's natural heritage.

In addition, Council works collaboratively with state and federal governments to ensure that state and federal legislation are implemented with new developments and enforced throughout the municipality.

Community Education and Capacity-building

Council plays a role in educating and raising awareness within the local community about natural heritage values and the importance of their preservation.

Much of Hume's biodiversity and other natural heritage assets occur on privately-owned rural land. By providing information, training and incentives, Council has a role to play in building the capacity of land managers, particularly rural landowners, to protect and enhance these natural heritage assets.

PLANNING & POLICY CONTEXT

Council will plan for and manage natural heritage assets in accordance with relevant federal, state and local legislation, policies and strategies (Appendix 1). The NHS 2011 - 2015 will operate within the context of this legislation, policy and strategy and complement their approach.

IMPLEMENTATION

Council will implement the NHS 2011 - 2015 actions in collaboration with key stakeholders (Appendix 2) and the Hume community. Progress on the actions will be reported annually to the community through Council's Sustainability Report and to Council via a Council report.



2. SETTING THE SCENE

2.1 NATURAL HERITAGE GENERAL

All natural heritage values in Hume, whether pertaining to geology and geomorphology, native vegetation, native fauna or waterways, form an interconnected web, or **ecosystem**, that is dependent upon all of its elements functioning in harmony. Where these natural heritage values are well connected, the integrity of local ecosystems is preserved.

2.1.1 Flagship Areas and Habitat Corridors

A number of areas within Hume contribute significantly to the ongoing function of ecosystems across the landscape. These areas, known as **Flagship Areas**, provide good **habitat** for a diversity of flora and fauna species and are usually associated with a network of local waterways (Map 2). A number of waterways in Hume also form habitat corridors between Flagship Areas, which are important in assisting native fauna move across the landscape.

Flagship Areas will guide Council's future investment in environmental on-ground works and rural landowner support to achieve strong conservation outcomes in Hume. They will also inform the natural heritage considerations of the Hume Municipal Strategic Statement and assist Council in ensuring that future development is integrated in a manner that maintains the integrity of local ecosystems.

2.2 GEOLOGY AND GEOMORPHOLOGY

Geology is the scientific study of rocks, their origins and their structure and composition, while geomorphology is the science of the origins and configuration of landscapes. Combined, they form the foundation of all environments and largely determine what types of soils and plant communities will exist within a landscape.

Hume supports a number of significant geological and geomorphological features, such as volcanic cones, road cuttings and river sediments. The Geological Society of Australia (GSA) has identified 30 such features in the Hume area. Collectively,

they are known as Sites of Geological and Geomorphological Significance (GGS). Three of these GGS sites occur on Council-managed land; an **avulsion channel** at Emu Bottom Wetlands Reserve, a **scoria** cone with associated volcanic deposits on Mt Holden and a rock cutting exposing older geology at Sunbury Landfill.

In addition to GGS sites, Hume contains many old volcanic cones that form **scenic hilltops** and a number of **major ridgelines** bordering the Jacksons Creek, Deep Creek and Emu Creek valleys. These geomorphological features contribute to Hume's rural and natural landscape character.

2.3 NATIVE VEGETATION

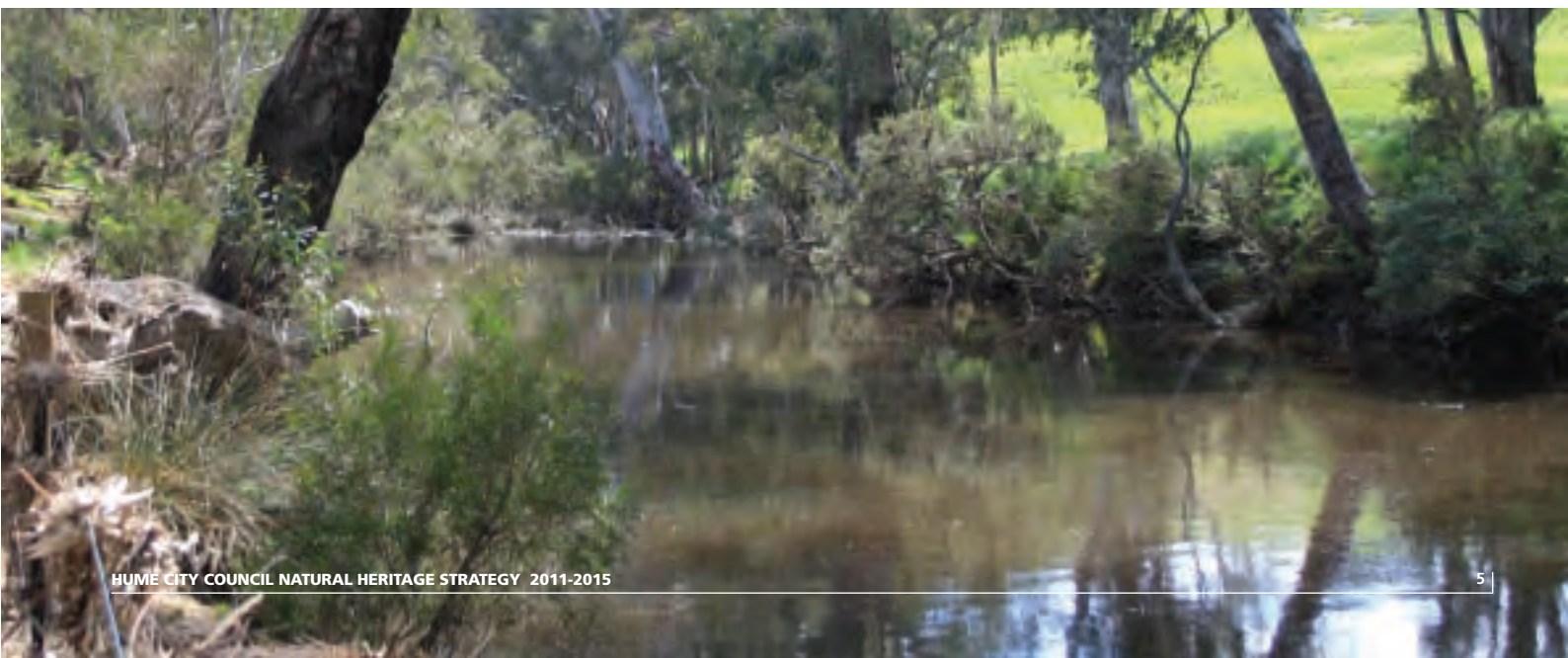
2.3.1 Native Vegetation in Hume

The majority of Hume resides within the Victorian Volcanic Plain **Bioregion**, an area that contains only 15.6% of its original vegetation cover, making it the most cleared bioregion in Victoria (VEAC & PPWCMA, 2010). This situation is also reflected in Hume, with only 16% (8,121 hectares) of original native vegetation remaining in fragmented patches across the landscape. Of this, 87% (7,080 hectares) is considered **endangered** (VEAC & PPWCMA, 2009).

2.3.2 Native Vegetation on Council-managed Land

From January 2011, Council had responsibility for managing 72 sites of **conservation significance** across 60 Council-owned reserves, 10 roadsides and two Crown Land reserves in Hume (Map 1).

Council also manages the habitat of threatened flora species, including Matted Flax-Lily (*Dianella amoena*), which is listed as Endangered under the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act 1999), and is on the **Threatened List** under the *Flora and Fauna Guarantee Act 1988* (FFG Act 1988). This species inhabits 12 sites managed by Council and is a high priority for management.



2.3.3 Native Vegetation on Private and Crown Land

The majority of Hume's remnant native vegetation occurs on private rural land and crown land sites, such as Woodlands Historic Park. The largest patches of this vegetation occur within Flagship Areas and are dominated by the Red Gum and Grey Box woodlands of the **basalt plains** of Hume.

2.3.4 Biosites

The Department of Sustainability and Environment (DSE) have identified a number of sites that are of biological significance in Hume (Map 4). These sites, known as Biosites, occur across Crown, Council-owned and private land. Fifty-five sites in Hume are currently on the Biosites list, including five sites of National Significance, 17 of State Significance, 28 of Regional Significance, three of Local Significance and two sites yet to be determined.

2.4 NATIVE FAUNA

Native fauna are an integral component of Hume's natural heritage and are important to the function of healthy ecosystems. In addition to having environmental value, fauna also provide a number of social and economic benefits to the community, including being a source of aesthetic appreciation for residents and supporting local tourism.

2.4.1 Fauna Records

Council maintains a record of all fauna sightings in the municipality, including those reported by the community, Council staff and those reported to the DSE's Victorian Biodiversity Atlas by contractors and consultants. At January 2011, a total of 7,865 sightings had been recorded since 1980, including 13 of the Swift Parrot (Endangered under the *EPBC Act 1999* and Threatened under the *FFG Act 1988*) and 66 of the Growling Grass Frog (Vulnerable under the *EPBC Act 1999* and Threatened under the *FFG Act 1988*).

2.4.2 Fauna on Council-managed Land

Council manages four sites that provide habitat for threatened fauna species. Species (Appendix 3) include the Golden Sun Moth, which is listed as Critically Endangered under the *EPBC Act 1999* and Threatened under the *FFG Act 1988*, and the Growling Grass Frog. Where these species occur, Council's management approach is in accordance with legislative requirements.

2.5 WATERWAYS

Waterways form some of the most iconic, natural features found within Hume. They also support many of Hume's remnant vegetation communities in a network of corridors that provide a link between Flagship Areas.

2.5.1 Council's Management of Waterways

A number of Council-managed reserves are adjacent to waterways. To protect and enhance these waterways, including their environments and water quality, Council undertakes extensive revegetation through programs such as the Greening (community tree planting) Program. In addition, Council assists rural landowners to revegetate their creek frontage through the Rural Areas Plant Donation Scheme and supports the work of other agencies to protect and enhance waterways.

Council also protects waterways through the application of planning scheme controls and policies. Council's Industrial Stormwater Code of Practice (ISCoP) provides requirements and guidance for stormwater management on industrial sites, which are common along creeks such as the Merri. The ISCoP requires that industrial land owners and businesses prevent and remove pollution from stormwater before it enters stormwater drains.

Council uses planning scheme controls, such as **Environmental Significance Overlays** (ESO's), to provide additional protection to waterways. ESO's currently cover the majority of the Jacksons, Deep and Emu Creeks and some stretches of the Merri and Moonee Ponds Creeks.



3. OPPORTUNITIES FOR ENHANCEMENT

A number of threats and challenges have been identified for each of the key themes. Linked to these challenges are a number of opportunities for Council to address key threats and improve on the management of natural heritage values. These opportunities are summarised below and underpin the actions set out in this strategy. The Natural Heritage Strategy Background Paper provides a more detailed discussion on each of the threats and challenges to natural heritage values.

3.1 NATURAL HERITAGE GENERAL

The following challenges and opportunities have been identified for natural heritage in Hume.

- **Environmental Integrity** – the ability of ecosystems to function requires that processes such as native plant pollination and seed dispersal are effective. Council can assist these processes by encouraging vegetation connectivity across the landscape through establishing **vegetation corridors, stepping stones and buffers** (Appendix 6). Although all natural heritage assets contribute to environmental integrity, instating these in Flagship Areas and along Habitat Corridors is likely to maximise environmental outcomes.
- **Land Use Change** – land use change, particularly urban development, invariably has a detrimental impact on the connectivity of natural and rural areas. However, Flagship Areas will provide Council with a mechanism to plan future growth in a more ecologically-sensitive manner.
- **Flagship Areas outside of the urban growth boundary** – with impending climate change, Flagship Areas within green wedge areas, including Greenvale, Wildwood, Sunbury West and a portion of Sunbury (Map 2), will become fundamental refuge areas for biodiversity and the maintenance of environmental integrity. Should the urban growth boundary be amended in the future, Council will have a role to play in advocating to the State government to maintain these Flagships in their entirety and protect them in perpetuity.
- **Flagship Areas within the urban growth boundary** – these areas, which include the Mickleham, Merri and Jacksons Flagship Areas and a portion of the Sunbury Flagship Area, are also important to ecosystem connectivity across the landscape. With future development planned for these areas, Council can advocate to the State government for the inclusion of large and well connected parklands, or lighter density rural development, through the Hume Integrated Growth Area Planning process. These approaches will ensure that the integrity of these Flagship Areas is not compromised in the long term.
- **Regional Natural Heritage Planning** – ecological processes are not governed by political boundaries. As such, how natural heritage values in Hume interplay with values in surrounding municipalities is an important

consideration. By undertaking landscape planning with adjacent councils and other agencies, Council can ensure that the connectivity of ecological processes at a regional scale is managed.

- **Community Awareness** – for the community to take action on natural heritage issues, it is important that they have strong awareness. Council has a role to play in encouraging the community to be more environmentally-aware.

3.2 GEOLOGY AND GEOMORPHOLOGY

The following opportunities have been identified to enhance the long-term protection of geological and geomorphological values in Hume.

- **Future Development** – identifying suitable planning scheme controls will assist in providing long-term protection for GGS sites and Scenic Hilltops and Major Ridgelines.
- **Soil Erosion** – mitigating soil erosion where it presents a threat to sensitive GGS sites such as river sediments will ensure their protection.

3.3 NATIVE VEGETATION

With only 16% of Hume's original native vegetation remaining, it is fundamental that the following opportunities are pursued.

- **Habitat Division and Isolation** – past land clearing in Hume has caused native vegetation habitat to become fragmented across the landscape. Improving vegetation connectivity across the landscape will reduce the impacts of habitat division and enhance ecological processes such as pollination and effective seed dispersal for many species.
- **Weeds** – weeds invade areas of native vegetation and compete with native species for space, light, water and nutrients. Targeting weeds for control at Council-managed conservation sites and supporting rural landowner efforts will significantly reduce this threat.
- **Rabbits** – rabbits directly graze on native plants and, when in large numbers, can devastate patches of native vegetation. Controlling rabbits on Council-managed land and supporting collaborative landowner programs will assist in minimising the impact of rabbits.
- **Livestock Grazing** – grazing of livestock in areas of native vegetation is practiced by many rural landowners in Hume. If not managed appropriately, stock can overgraze on native vegetation and cause soil compaction, which inhibits the germination of native plants. Building the capacity of landowners to manage grazing effectively will be important in reducing this threat to native vegetation.

- **Land Use Change** – the development of rural land invariably has an impact on native vegetation. The Hume Planning Scheme requires developers to avoid or minimise vegetation removal and, where removal is unavoidable, to offset the loss. Council also has planning scheme controls, such as ESO's and Vegetation Protection Overlays (VPO's) in place to protect significant areas of vegetation (Map 3).

It is important that Hume's ESO's and VPO's align with Flagship Areas and Biosites to ensure the long-term protection of these significant areas. These overlays currently cover approximately 65% of Flagships and Biosites (Map 4). By reviewing the existing ESO's and VPO's, Council can improve the effectiveness of these overlays in protecting native vegetation.

- **Illegal Destruction of Native Vegetation** – native vegetation can be destroyed by activities such as unauthorised vehicle access into conservation areas, dumping of fill from development sites and ploughing in rural areas where native grasslands occur. Through a combination of education and enforcement, Council can contribute to a reduction in these activities.

- **Land Manager Knowledge and Skills** – lack of landowner knowledge about remnant vegetation and how to effectively manage it provides an ongoing challenge to the protection of native vegetation in Hume. Council can foster skill and knowledge-building by providing rural landowners with education, training and incentives.
- **Community Perception of Native Grasslands** – despite their environmental significance, community members perceive grasslands, with their rugged, grassy appearance, as unused and unmanaged areas. Council can address this challenge through education and awareness programs.
- **Monitoring of Conservation Sites** – by increasing the monitoring of Council-managed conservation sites, Council can better ensure that management strategies are effective in enhancing conservation values.
- **Prioritisation and Planning of Conservation Sites** – reviewing Council's current system for ranking sites to prioritise resource investment will enable more effective prioritisation of resources into Council-managed sites. By developing conservation management plans for significant sites, Council will improve the strategic management of sites across the municipality.
- **Vegetation Offsets** – **vegetation offsets** may be created within Council-owned land which has existing conservation values. To achieve this, the proposed offset sites require on-title protection in perpetuity. Placing permanent protection on Council-owned sites suitable for offsets will provide Council with an opportunity to secure resources from land developers for the short and medium-term management of these areas. Identifying suitable sites within Flagship Areas or Habitat Corridors provides a mechanism for Council to achieve long-term protection of these important areas.

3.4 NATIVE FAUNA

A number of opportunities exist to reduce the current threats and challenges to native fauna species and their populations across Hume.

- **Knowledge Barriers** – lack of knowledge about the distribution of fauna populations is a challenge all biodiversity managers face. By undertaking surveying, Council can gain a better understanding of local fauna populations, enabling management strategies to be tailored to benefit individual species.



- **Pest Animals** – foxes and cats, both domestic and feral, pose a significant threat to native fauna in Hume. While rabbits are the main prey of these species, they can also opportunistically prey on native animals. By assessing the severity of this threat, Council can determine whether or not action is required.
- **Habitat Loss** – habitat loss, such as removal of native vegetation, is a significant threat to native fauna. Lack of natural regeneration, coupled with vegetation clearing over the past 150 years, has also resulted in the demise of **hollow-bearing trees** across Hume, which many species of fauna rely upon to survive. Council can address habitat loss by working with rural landowners to establish vegetation corridors, stepping stones and buffers across the landscape.
- **Human and Wildlife Interaction** – negative interaction can sometimes occur between people and wildlife, particularly when they share the same space. These interactions include bird swooping, the presence of snakes in parklands, possums in urban backyards, mobs of kangaroos in rural areas, noise pollution caused by camps of fruit bats and damage to property caused by flocks of Cockatoos and Corellas. Council has a role to play in raising community awareness and encouraging positive interaction between local residents and wildlife.
- **Erosion and Sedimentation** – erosion along waterways is prominent in areas where native vegetation has been removed in the past and it usually results in **sedimentation**, the discharge of soil into a waterway. Some Council-managed reserves along the Jacksons Creek valley in Sunbury are affected, including Albert Rd Nature Reserve, The Parkway Reserve and Mt Holden Reserve. By undertaking restoration, Council can reduce the impacts of erosion at these sites.
- **Agricultural and Urban Runoff** – **runoff** from rural properties and urban areas can transport a number of pollutants into a waterway. These include residues from herbicides, pesticides and fertilisers, faecal contaminants from livestock, oils, household chemicals and industrial chemicals. Council has a role to play in educating residents about the impacts of these processes and seeing that enforcement action is taken where legislation has been breached.
- **Degraded Riparian Environments** – some degraded **riparian** environments still persist along waterways in Hume. Degradation typically includes a lack of riparian vegetation, stream bank erosion and high weed infestation. Council can address this threat by remediating waterways adjacent to Council-managed land and by supporting the work of rural landowners and other agencies in restoring waterway environments.

3.5 WATERWAYS

The condition of creeks can deteriorate progressively downstream as a result of poor quality drainage, runoff from urban and agricultural land, growth of weeds, bed and bank erosion, loss of in-stream habitat and the presence of barriers to fish migration (Melbourne Water Corporation, 2007). These and other threats to the health of waterways need to be addressed if the condition of Hume's waterways is to improve.

- **Waterway Buffers** – for waterways to function effectively as Habitat Corridors, it is fundamental that they have a wide buffer against development or other encroachments. A minimum buffer of 100 metres on either side of a Habitat Corridor is required, which should include 50 metres of riparian vegetation either side of the creek. On smaller creek tributaries, a 50 metre buffer should be sought. By advocating for these buffer requirements in Hume's future growth corridors, Council can seek strong outcomes for waterways in Hume.



4. NATURAL HERITAGE GOALS AND OBJECTIVES

The following goals and objectives represent Council's strategic directions for the protection and enhancement of natural heritage assets in Hume.

4.1 GOALS

Goal 1: To demonstrate excellence in stewardship

The health and sustainability of land is dependent upon how well it is cared for. In order to protect and sustain Hume's natural heritage assets, it is fundamental that Council demonstrates good stewardship of the natural areas it is responsible for managing. The community also has an important role to play in protecting natural heritage assets. By managing natural heritage soundly, Council can set a positive example and encourage the community and other organisations to do the same.

Goal 2: To foster community learning and action

Fostering learning within the community is fundamental to raising awareness about important issues and inspiring action. To ensure the long-term protection and enhancement of natural heritage values in Hume, significant community action will be required in tandem with the efforts of Council and other organisations. The level of action taken will be dependent upon the level of skills within the community and the availability of support and incentives.

Goal 3: To influence and advocate

The level of investment by government agencies and public authorities in natural heritage management can significantly affect the success of Council and community efforts. Where this investment complements the activities of Council and the community, strong environmental outcomes can be achieved.





4.2 OBJECTIVES AND KEY PERFORMANCE INDICATORS

Natural Heritage General:

	Objectives	Our Responsibility and Commitment
Foster Community Learning and Action	Increase community knowledge and appreciation of natural heritage assets.	To interpret natural heritage assets and promote them through local tourism. To provide educational and engaging workshops and activities for our community.
	Build the capacity of rural landowners, Landcare groups and Friends groups to protect and enhance natural heritage assets.	To provide training, educational materials and incentives to community groups and rural landowners who wish to enhance natural heritage assets in Hume.
	Foster community leadership in natural heritage stewardship.	To develop natural heritage leaders within our community that can support landowners, community groups and schools in protecting and enhancing natural heritage assets.

Geology and Geomorphology:

	Objectives	Our Responsibility and Commitment
Demonstrate Excellence in Stewardship	Protect Sites of Geological and Geomorphological Significance, Scenic Hilltops and Major Ridgelines in Hume.	To ensure these significant landscape features are protected from development and enhanced for the enjoyment of our community.

Key Performance Indicator (KPI)	KPI Measure	KPI Baseline Result	Target
KPI 1: Positive change in community awareness of natural heritage.	Surveys (pre and post event and program).	Baseline data for awareness and community capacity to be collected as part of the implementation of this strategy.	40% increase in community awareness by 2015.
KPI 2: Positive change in community capacity to manage natural heritage.	Number of community members participating in annual natural heritage events.	Number of participants in the Community Greening Program in 2010-11 was 309.	150% increase in participation in the Greening Program by 2015. 40% increase in community capacity to manage natural heritage by 2015.

Key Performance Indicator (KPI)	KPI Measure	KPI Baseline Result	Target
KPI 3: Strengthened statutory protection for significant geological sites and features.	Number of sites protected by relevant planning scheme controls.	'Guidelines for Development of Scenic Hilltops and Major Ridgelines Policy' currently in place.	All sites protected by relevant planning scheme controls.

Native Vegetation:

	Objectives	Our Responsibility and Commitment
Demonstrate Excellence in Stewardship	Increase the quality and quantity of native vegetation on private rural land.	<p>To strive to achieve a net gain in native vegetation quality and quantity across the rural landscape.</p> <p>To enhance our green wedge areas by supporting rural landowner revegetation and natural regeneration programs.</p>
	Increase the quality and quantity of native vegetation on Council-managed land.	To strive to achieve a net gain in native vegetation quality and quantity on Council-managed land by undertaking revegetation and regeneration programs.
	Protect remnant, native vegetation on private and Council-managed land.	<p>To manage weed and pest animal threats on Council-managed land.</p> <p>To ensure Council-managed areas of native vegetation are securely fenced.</p> <p>To seek perpetual protection for native vegetation sites through covenants and planning controls.</p> <p>To ensure that Flagship Areas are considered in future development and that development is integrated in a manner that maintains the integrity of habitat.</p>
	Protect and enhance threatened flora species and communities on Council-managed land.	<p>To manage weed, pest animal and other threats around existing populations of threatened species.</p> <p>To promote the expansion of threatened species populations and the diversification of species to secure their long-term survival.</p>
	Strategically manage conservation sites on Council-managed land.	<p>To prepare, implement and review conservation management plans for native vegetation sites on Council-managed land.</p> <p>To prioritise our financial investment to maximise native vegetation outcomes.</p>
	Strategically monitor conservation assets on Council-managed land.	To regularly monitor and review our management performance, and adapt to changing conditions.
	Ensure the management of all Council-managed offset sites meet the legislative requirements of their Environmental Management Plans.	To regularly audit our management regimes and ensure our performance meets legislative requirements.
Foster Community Learning and Action	Raise community awareness about the value of native vegetation in Hume.	To encourage our community to be more aware of the value of, and the threats to, native vegetation in Hume.
	Build the capacity of rural landowners to manage native vegetation on their land.	To support rural landowners in developing the necessary skills required to effectively manage remnant native vegetation on their land by providing training, educational materials and incentives.
Influence and Advocate	Protect native vegetation from the threat of weeds.	To advocate to State & Federal government departments and agencies for increased resource allocation to weed issues in Hume.

Key Performance Indicator (KPI)	KPI Measure	KPI Baseline Result	Target
KPI 4: Increase in the quantity of remnant native vegetation within conservation areas on Council-managed and private land.	Percentage cover of native vegetation within conservation areas.	Baseline data on percentage cover of native vegetation to be collected as part of the implementation of this strategy.	Mean 5% increase in native vegetation cover across all conservation areas.
KPI 5: Increase in the extent of threatened flora species on Council-managed land.	Extent of threatened flora species on Council-managed conservation sites.	Baseline data on current extent of threatened species to be collected as part of the implementation of this strategy.	5% increase in the extent of threatened flora species on Council-managed land.
KPI 6: Council-managed conservation sites are strategically monitored and managed through Conservation Management Plans.	Percentage of Conservation Management Plans developed and reviewed.	As of January 2011, a Conservation Management Plan had been developed for 60% of Council-managed conservation sites.	7% increase in the number of Conservation Management Plans (CMP's). Review 6% of existing CMP's.
KPI 7: Increase in the number of hectares of Council-owned land under permanent protection.	Number of hectares of Council-owned land under permanent protection on-title.	Four hectares of Council-owned land is currently protected under a Trust for Nature covenant at Evans Street Grassland.	An additional 12 hectares of Council-owned land permanently protected by 2015.
KPI 8: Positive change in community awareness of the value of native vegetation.	Surveys (pre and post event and program).	Baseline data on awareness and community capacity to be collected as part of the implementation of this strategy via survey.	40% increase in community awareness by 2015.
KPI 9: Positive change in community capacity to manage native vegetation.	Number of community members participating in annual native vegetation training events.		40% increase in community capacity to manage native vegetation by 2015.
KPI 10: Increase in weed compliance in Hume by the State Government.	Number of weed compliance inspections undertaken on private land in Hume by the Department of Primary Industries (DPI).	In 2010-11, DPI did not undertake any compliance in Hume.	20 annual DPI compliance inspections in Hume by 2015.

Native Fauna:

	Objectives	Our Responsibility and Commitment
Demonstrate Excellence in Stewardship	Improve Council's knowledge of the distribution of local fauna populations.	<p>To strive to better understand the habitat requirements of local fauna, through surveying and monitoring, so that we can effectively manage their habitat.</p> <p>To support rural landowners to monitor and survey fauna on their land.</p>
	Improve Council's response to incidences of negative human-wildlife interaction.	To develop policies that ensure we effectively and consistently respond to incidences of negative human-wildlife interaction, such as the swooping by Magpies.
	Seek to minimise the threat to native fauna in Hume posed by foxes and domestic and feral cats.	<p>To investigate the viability of fox and feral cat control programs on Council-managed land.</p> <p>To educate Hume residents about responsible pet ownership.</p>
	Raise community awareness about native fauna in Hume.	To provide educational materials and engaging and educational workshops and activities to our community.
Foster Community Learning and Action	Build the capacity of rural landowners to manage pest animals on their land.	To support rural landowners in developing the necessary skills required to manage pest animals by providing training, educational materials and incentives.

Key Performance Indicator (KPI)	KPI Measure	KPI Baseline Result	Target
KPI 11: Increase in knowledge of the distribution of local fauna populations.	Fauna surveying.	Baseline data to be collected as part of the implementation of this strategy.	10 Council-managed conservation sites thoroughly surveyed by 2015.
KPI 12: Positive change in community awareness of native fauna. KPI 13: Positive change in community capacity to manage native fauna habitat.	Surveys (pre and post event and program). Number of fauna sightings reported by the community annually.	Baseline data on awareness and community capacity to be collected as part of the implementation of this strategy. In the 2010-11, 28 fauna sightings were reported to Council by the community.	40% increase in community awareness by 2015. 40% increase in community capacity to manage native fauna by 2015. 20% increase in fauna sightings reported by the community by 2015.

	Objectives	Our Responsibility and Commitment
Demonstrate Excellence in Stewardship	Restore native vegetation along waterways on private and Council-managed land.	<p>To undertake waterway revegetation programs on Council-managed land.</p> <p>To support revegetation efforts along waterways by rural landowners.</p>
	Seek to mitigate soil erosion and sediment dispersal along waterways on Council-managed land.	<p>To protect waterways from contaminants on Council-managed land.</p> <p>To reduce the impacts of soil erosion in the long-term.</p>
	Undertake catchment management in collaboration with other councils and organisations.	<p>To collaborate with adjacent councils and other organisations on catchment management projects, such as waterway restoration.</p> <p>To complement the investment of other organisations to improve the environmental outcomes of restoration projects.</p>
	Strengthen Council guidelines to enhance protection of waterways in Hume.	To ensure that guidelines, such as open space development guidelines and planning scheme policies, are effective in protecting waterways in Hume.
Foster Community Learning and Action	Build the capacity of rural landowners to manage waterways on their land.	To support rural landowners in developing the necessary skills required to manage waterways by providing training, educational materials and incentives.
Influence and Advocate	Seek greater collaboration between Council and government agencies in the management of rabbits.	To advocate for better collaboration between Council and government agencies to support the efforts of our community in dealing with rabbits.

Key Performance Indicator (KPI)	KPI Measure	KPI Baseline Result	Target
<p>KPI 14: Increase in the extent of native vegetation on Council-managed land adjacent to waterways.</p> <p>KPI 15: Increase in the extent of native vegetation along waterways on private rural land.</p>	<p>Number of indigenous plants recruited annually along waterways on Council-managed land and private rural land.</p>	<p>In 2010-11, 5,833 plants were planted along waterways on Council-managed land through the Greening Program.</p> <p>In 2010-11, 11,762 plants were donated to rural landowners with land adjacent to waterways through Council's Rural Areas Plant Donation Scheme.</p> <p>Baseline data on rural landowner revegetation of waterways through other sources to be collected as part of the implementation of this strategy.</p>	<p>10,000 indigenous plants recruited annually along waterways on Council-managed land.</p> <p>12,000 indigenous plants recruited annually along waterways on private land through the Rural Areas Plant Donation Scheme.</p>
<p>KPI 16: Positive change in community capacity to manage waterways.</p>	<p>Surveys (pre and post event and program).</p>	<p>Baseline data on community capacity to be collected as part of the implementation of this strategy.</p>	<p>40% increase in community capacity to manage waterways by 2015.</p>
<p>KPI 17: Increase in the number of collaborative rabbit management projects between Council and Melbourne Water.</p>	<p>Percentage of Melbourne Water rabbit management works aligned with Council rabbit control works.</p>	<p>In 2010-11, no Melbourne Water rabbit management works were aligned with Council rabbit control works.</p>	<p>20% of Council's annual rabbit control works supported by complementary Melbourne Water rabbit management works by 2015.</p>



APPENDICES

APPENDIX 1. SUPPORTING LEGISLATION, POLICIES AND STRATEGIES

Key Legislation and Policy

- *Environmental Protection and Biodiversity Conservation Act 1999*
- *Planning and Environment Act 1987*
- *Flora and Fauna Guarantee Act 1988*
- *Wildlife Act 1975*
- *Catchment and Land Protection Act 1994*
- Hume Planning Scheme
- Australia's Biodiversity Conservation Strategy 2010 – 2030
- Natural Heritage Charter 2002
- Victoria's Biodiversity Strategy 2010 – 2015: Biodiversity is Everybody's Business
- Victoria's Native Vegetation Management: A Framework for Action
- Port Phillip and Westernport Regional Catchment Strategy 2004 – 2009
- Victorian Environmental Assessment Council Remnant Native Vegetation Investigation, March 2011

Supporting Council Documents

- Hume City Council Plan 2009 – 2013
- Hume City Council Plan 2030 – Building a Future Together
- Hume Municipal Strategic Statement
- Pathways to Sustainability: An Environmental Framework 2009 - 2013
- Hume City Council Annual Sustainability Report
- Sustainable Land Management Strategy 2010 – 2013
- Hume City Council Open Space Strategy 2010 – 2015
- Green Wedge Management Plan – Phase 1
- Hume Rabbit Action Plan

APPENDIX 2. STAKEHOLDERS

There are many stakeholders with an interest in Hume's natural heritage. Key stakeholders include:

- The Hume community: residents, businesses and landowners
- Community groups: Friends groups, Landcare groups and other resident groups
- Local Committees: Merri Creek Management Committee, Moonee Ponds Creek Coordination Committee
- Schools and tertiary institutions
- Victorian State Government Departments and agencies, including:
 - Department of Sustainability and Environment
 - Department of Primary Industries
 - Department of Planning and Community Development
 - Port Phillip & Westernport Catchment Management Authority
 - Parks Victoria
- Commonwealth Government
- Public authorities: Melbourne Water, VicTrack, VicRoads
- Trust for Nature
- Neighbouring Councils: City of Whittlesea, Moreland City Council, Brimbank City Council, Melton Shire Council, Shire of Macedon Ranges and Mitchell Shire Council.

APPENDIX 3: COUNCIL-MANAGED SITES WITH CONSERVATION SIGNIFICANCE

Locality	Site Number (Corresponds to Map 1)	Name of Site(s)	Year of current Management Plan	Type of Management Plan	
Sunbury	1	Emu Bottom Wetlands Reserve	2007	Conservation	
	2	Riddell Road Roadside Woodland	2002	Conservation	
	3	Parkway Drainage Reserve	2007	Conservation	
	4	Sunbury Recreation Reserve			
	5	Spavin Lake			
	6	Emu Creek Crossing	2005	Conservation	
	7	Correa Escarpment			
		The Nook Reserve	2001	Conservation	
	8	Evans Street Wildflower Grassland	2004	Conservation	
	9	Black Hill Bridge, Clarkefield			
	10	Blind Creek Parklands			
	11	Albert Road Nature Reserve	2004	Conservation	
	12	Riddell Road Woodland	2008	Conservation	
	13	Stewarts Lane Nature Reserve	2003	Conservation	
	14	Kismet Creek Woodlands	2003	Conservation	
	15	Kismet Creek South			
	16	Settlers Way Reserve			
	17	Blind Creek Linear Parkland			
	18	Spavin West Drainage Reserve	2001	Conservation	
	19	Dalrymple Road Grassland	2000	Conservation	
	20	Albert Road Drainage Reserve			
	21	Dalrymple Roadside Woodland			
	22	Mt Holden Reserve	2008	Conservation	
	23	Jackson Hill (Hammersmith Crt)			
	24	Fulwood Drive Ring			
	25	Fulwood Drive Reserve			
	26	Tandara Site	2009	Environmental	
	27	Target Site	2009	Environmental	
	28	Raes Road Grassland	2005	Conservation	
	29	Gellies Road Grey Box			
	30	Sunbury Pop Festival Site	2007	Conservation	
Kalkallo	31	Kalkallo Creek Reserve	2007	Conservation	
	32	Kalkallo Common Grassland	2010	Conservation	
	33	Kalkallo Common South			
	34	John Laffan Reserve	2008	Conservation	
Mickleham	35	Mt Ridley Nature Reserve	2007	Conservation	
		Forest Red Gum Reserve	2007	Conservation	
	36	Snow Gum Lane	2009	Conservation	
	37	Sanctuary Rise			
	38	Old Sydney Road	2002	Conservation	

	Develop / Review Plan (priority)	EVC	EPBC Listed Species Present
	Low	GW	
	High	GW	
	Low	GW	
	Low	GW	
	Low	VGF	
	Medium	SS	Growing Grass Frog (Vulnerable)
	High	ES	
	Low	GW, SS	
	Very High	PG	Matted Flax Lily (Endangered), Sunshine Diuris (Endangered)
	Low	GW	
	Low	VGF	
	Medium	GDF	
	Medium	GW	
	Medium	VGF	
	Medium	VGF	
	Low	VGF	
	Low	GW	
	Low	VGF	
	Medium	VGF	
	High	PG	Matted Flax Lily (Endangered)
	Low	VGF	
	Low	GW	
	Medium	GDF	
	Low	PGW	
	Medium	GW	
	Low	GW	
	Low	GW	
	Low	PG	
	Medium	PG	
	Low	PGW	
	High	SS, ES	
	Low	PG	
	Low	PG	
	Medium	PG	
	Medium	ES	Matted Flax Lily (Endangered)
	High	PGW, PG	Matted Flax Lily (Endangered)
	Medium	PGW	
	Medium	PGW	
	Low	PG	
	High	GW	

Locality	Site Number (Corresponds to Map 1)	Name of Site(s)	Year of current Management Plan	Type of Management Plan	
Somerton	39	Somerton Red Gum Nature Reserve	2007	Conservation	
Craigieburn	40	Frog Crt	2008	Conservation	
		Rushwood Drive	2007	Conservation	
	42	Malcolm Ck Lower	2006	Conservation	
		Elsternwick Way	2008	Conservation	
	43	Amberfield Grasslands	2008	Environmental	
	44	Malcolm Ck Upper			
	45	Aitken Creek Parklands	2005	Conservation	
Bulla	46	Parkview Grasslands	2006	Environmental	
	47	Martin Dillon Reserve	2007	Conservation	
	48	Trap St Reserve	2007	Conservation	
	49	Bulla Gold Tree Hill Reserve			
Oaklands Junction	50	Bulla School Hill			
	51	Oaklands Sheoaks			
	52	Bardwell Triangle Roadside			
Greenvale	53	Konagaderra Reserve	2008	Conservation	
	54	Greenvale Recreation Reserve	2003	Conservation	
Campbellfield	55	Providence Road Roadsides			
	57	National Business Park	2007	Conservation	
Westmeadows	58	Broadmeadows Valley Park (BVP) – Pimelea			
		BVP Themeda	2005	Conservation	
		BVP Poa			
		BVP Thelymitra			
		BVP Perched Marsh			
Attwood	60	Attwood Creek Parklands	2008	Conservation	
	61	Banksia Gardens	2005	Conservation	
	62	Broadmeadows Valley Park - Stylidium Site	2005	Conservation	
	63	Northcorp	2009	Environmental	
	64	Maygar Grey Box	2008	Conservation	
	65	Maygar Grassland	2008	Conservation	
	66	Pascoe Vale Rd Grasslands			
Meadow Heights	67	Broadmeadows Valley Park (BVP) - Shankland Wetlands			
		BVP Bracken Knoll Site			
Other	68	Eucalyptus Court	2007	Conservation	
	69	Arcadia Park	2007	Conservation	
	70	Malcolm Creek Grasslands	2009	Environmental	
	71	Emu Valley Reserve			
	72	The Glade			

	Develop / Review Plan (priority)	EVC	EPBC Listed Species Present
	Low	PGW	
	Very High	PG, ES	Growling Grass Frog (Vulnerable)
	Very High	PG, ES	Growling Grass Frog (Vulnerable)
	Low	CGW	
	Medium	CGW	Matted Flax Lily (Endangered)
	Low	PGW	Golden Sun Moth (Critically Endangered), Matted Flax Lily (Endangered)
	Low	CGW	Matted Flax Lily (Endangered)
	Medium	CGW	
	Low	PG	Matted Flax Lily (Endangered)
	Low	SS	
	Low	SS	
	High	HHW	
	High	HHW	
	Low	PGW	
	High	GW	Matted Flax Lily (Endangered)
	Low	GW, SS	
	Very High	HHW	
	High	HHW	
	Low	PGW	
	Medium	PGW	
	Medium	PGW	
	Low	PGW	
	Low	PGW	
	Low	PGW	
	Low	GW	
	Medium	PG	
	Medium	PGW	
	Low	CGW	
	Low	PGW	
	Low	PG	Matted Flax Lily (Endangered)
	Low	PG	
	Low	PGW	
	Low	PGW	
	Medium	PGW	Matted Flax Lily (Endangered)
	Very High	PGW	
	Low	PG	Matted Flax Lily (Endangered)
	Very High	GW	
	Very High	SS	

APPENDIX 4: ACRONYMS AND ABBREVIATIONS

CaLD	Culturally and Linguistically Diverse
CGW	Creekline Grassy Woodland
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
ES	Escarpment Shrubland
ESO	Environmental Significance Overlay
FFG Act	<i>Flora and Fauna Guarantee Act 1988</i>
GDF	Grassy Dry Forest
GGs	Geological and Geomorphological Significance
GW	Grassy Woodland
HHW	Hills Herb-rich Woodland
NHS	Natural Heritage Strategy
PG	Plains Grassland
PGW	Plains Grassy Woodland
RAPDS	Rural Areas Plant Donation Scheme
SS	Stream-bank Shrubland
VGF	Valley Grassy Forest
VPO	Vegetation Protection Overlay

APPENDIX 5: GLOSSARY OF TERMS

Avulsion Channel

The former channel of a waterway that has changed course.

Basalt Plains

Extensive plains that were formed when ancient volcanoes in the region erupted and covered the landscape in basaltic lava.

Biodiversity

The variety of all life forms, including:

- genetic diversity – the variety of genes contained in each individual lifeform,
- species diversity – the variety of species,
- ecosystem diversity – the variety of ecological communities and habitats.

Bioregion

An area where all ecological communities, soils, geology and landforms are similar or uniform.

Buffer

An area of non-invasive vegetation surrounding a patch of remnant vegetation that provides a barrier to external threats such as weed invasion.

Catchment

A geographical area that catches and drains rain water.

Conservation Significance

A measure of the significance of a remnant patch of vegetation taking into account the bioregional conservation status, type and quality of the vegetation.

Ecosystem

A biological system that includes all abiotic (non-living) and biotic (living) components that interact to create a system at a variety of spatial scales.



Endangered

A classification used to identify species and environments that are threatened with extinction.

Environmental Protection and Biodiversity Conservation Act 1999

Commonwealth legislation pertaining to the status and protection of species and environments in Australia that are threatened with extinction.

Environmental Significance Overlay

A form of protection within the State Planning Policy Framework and the Local Planning Policy Framework indicating that environmental values occur in an area to which an overlay covers.

Eutrophication

A state whereby a water body becomes inundated with excess nutrients, often resulting in an imbalance within the system.

Flagship Area

An area identified within Hume containing large patches of native vegetation or waterway environments that provide habitat for a diversity of flora and fauna species.

Flora and Fauna Guarantee Act 1988

Victorian legislation pertaining to the status and protection of threatened flora and fauna species.

Habitat

The living space that an individual organism, population or community of organisms utilises to survive.

Habitat Corridor

A major waterway in Hume that provides a link between Flagship Areas. Habitat Corridors should have a minimum width of 100 metres either side of a waterway and support a 50 metre riparian vegetation zone.

Habitat Division

The division of a single, larger patch of habitat for a species into a number of smaller patches.

Hollow-bearing Trees

Large old trees that have developed hollows where old branches have been dropped. Typically found in Eucalypts, hollows can take up to hundreds of years to develop.

Macro-invertebrate

An invertebrate (spineless animal) that can easily be seen with the naked eye.

Major Ridgelines

Ridgelines along escarpments and valleys that have aesthetic value and/or provide scenic views of the surrounding landscape.

Natural Heritage

The original natural environment, including biodiversity, geology and landforms that current generations have inherited from the past to manage for the benefit of future generations.

Riparian

Relating to or inhabiting the banks of a natural course of water. Riparian zones are ecologically diverse and contribute to the health of other aquatic ecosystems by filtering out pollutants and preventing erosion.

Run off

Any precipitated water that drains from the surrounding land into nearby creeks or rivers.

Scenic Hilltops

Hilltops in Hume, such as dormant volcanoes, that have aesthetic value and/or provide scenic views of the surrounding landscape.



Scoria

A thick, porous rock derived from lava that solidifies around the cone of some volcanoes.

Sedimentation

The process whereby soil particles that have been suspended in water settle out and deposit on stream banks or flood plains. This is a natural process, but can be exacerbated by altered hydrological cycles and increased sediment loads in waterways.

Stepping Stone

Small patches of native vegetation, such as wetlands and paddock trees, that help species move from one area of habitat to another in a fragmented landscape.

Threatened List

A list of species that are classified as Threatened under the *FFG Act 1988* and, as such, are protected under this legislation. A permit or licence must be obtained before any works are conducted that may result in the collection, removal, injury or disturbance of threatened species.

Vegetation Corridor

An area of vegetation, usually planted, that connects areas of remnant vegetation together. These connections help to facilitate the movement of species through a broader fragmented landscape.

Vegetation Offsets

A vegetation offset is any works undertaken to make reparation for the loss of native vegetation arising from the removal or destruction of native vegetation. The gains achieved must be permanent and ongoing and typically include either management of remnant native vegetation or revegetation.

Waterway

All rivers, creeks, streams, natural channels, lakes, billabongs, swamps and marshes in which water flows or is collected, whether the flow is continuous or not. A waterway includes the banks and riparian environment.

Weeds

Weeds are plants growing somewhere where they are not wanted.



APPENDIX 6: EXAMPLE OF HABITAT CORRIDORS, BUFFERS AND STEPPING STONES TO LINK FLAGSHIP AREAS



1:150,000

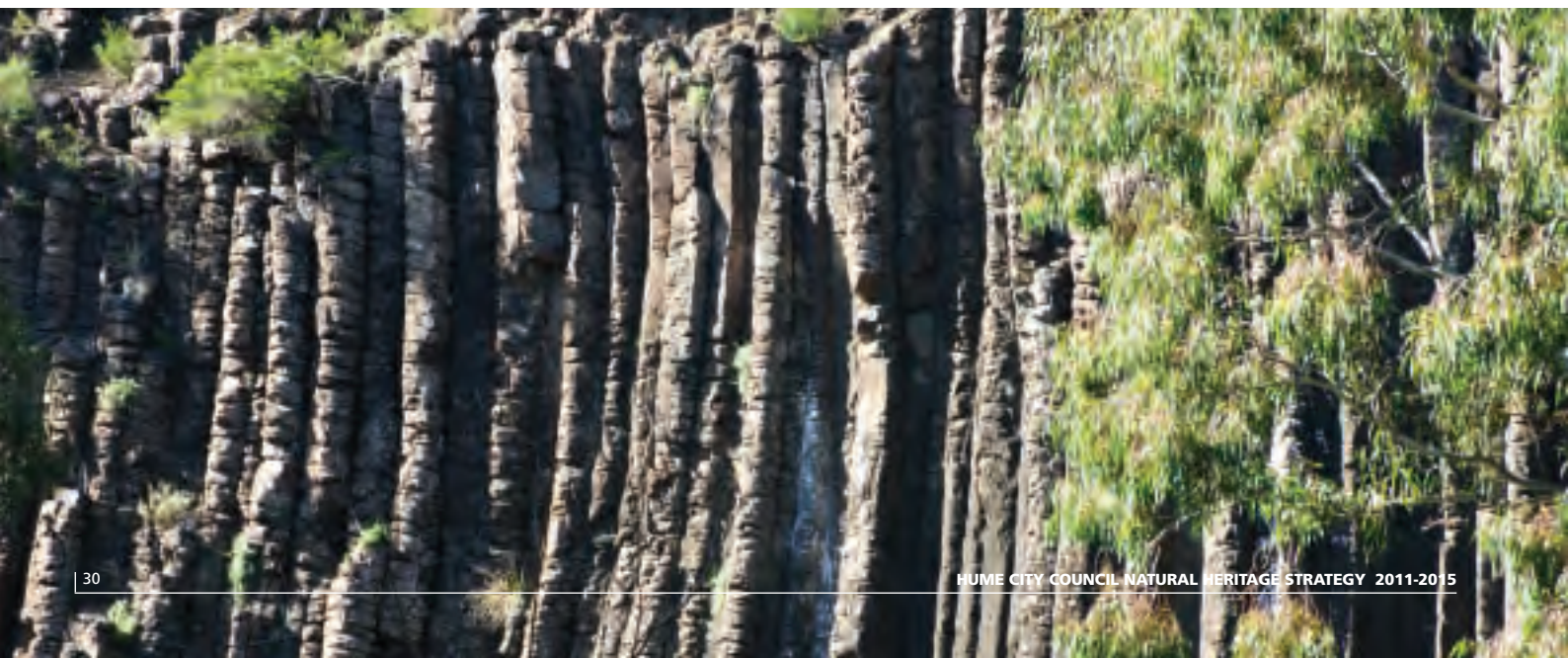
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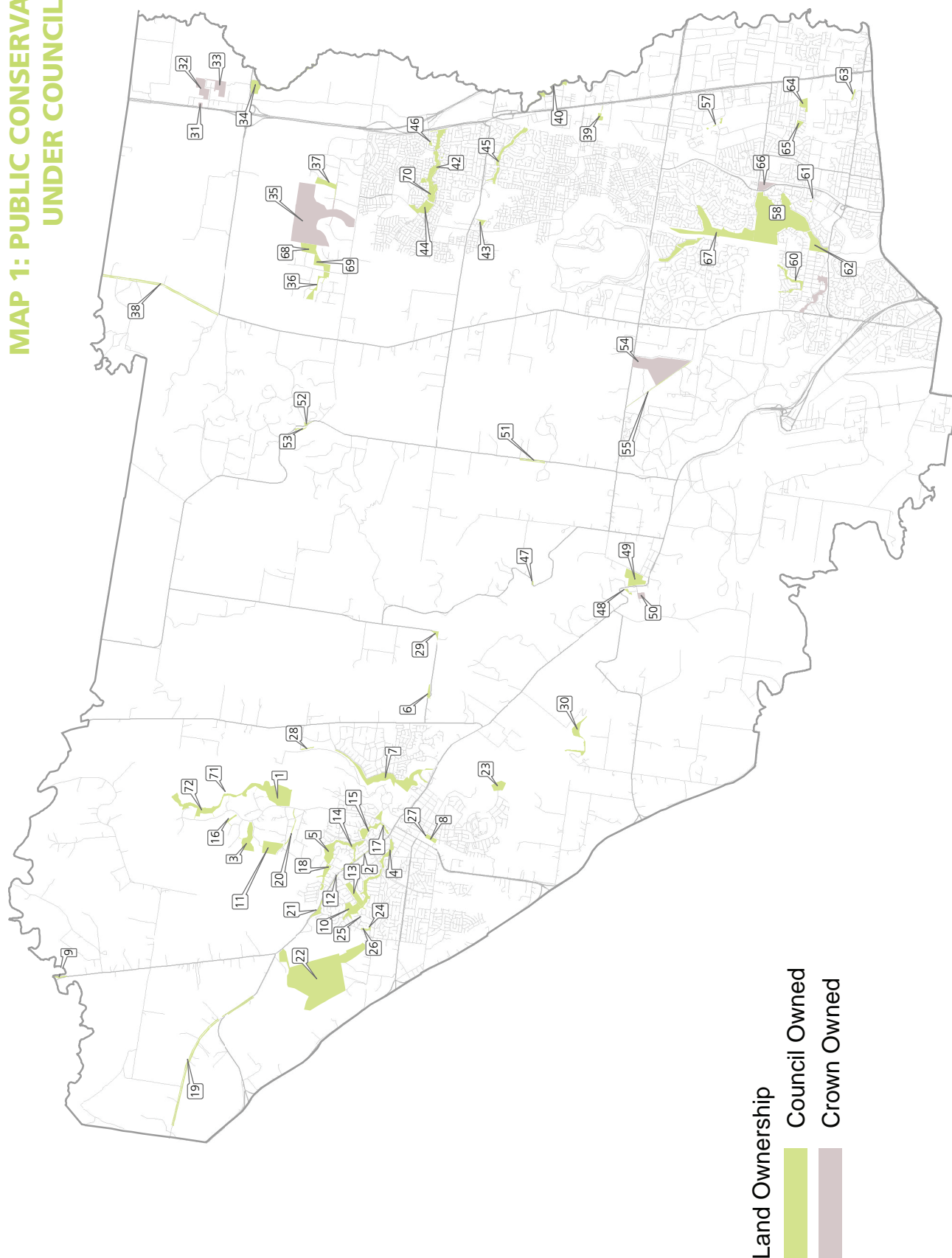
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Port Phillip and Western Port Catchment Management Authority, 2009, *Assessing the effectiveness of Local Government Planning Scheme controls in protecting native vegetation in the Port Phillip and Westernport Region*, The State of Victoria, Melbourne, available: <http://www.ppwcma.vic.gov.au/Resources/PublicationDocuments/55/PPWCMA%20Overview%20of%20Native%20Veg%20planning%20project.pdf> (Accessed 28 July 2010)

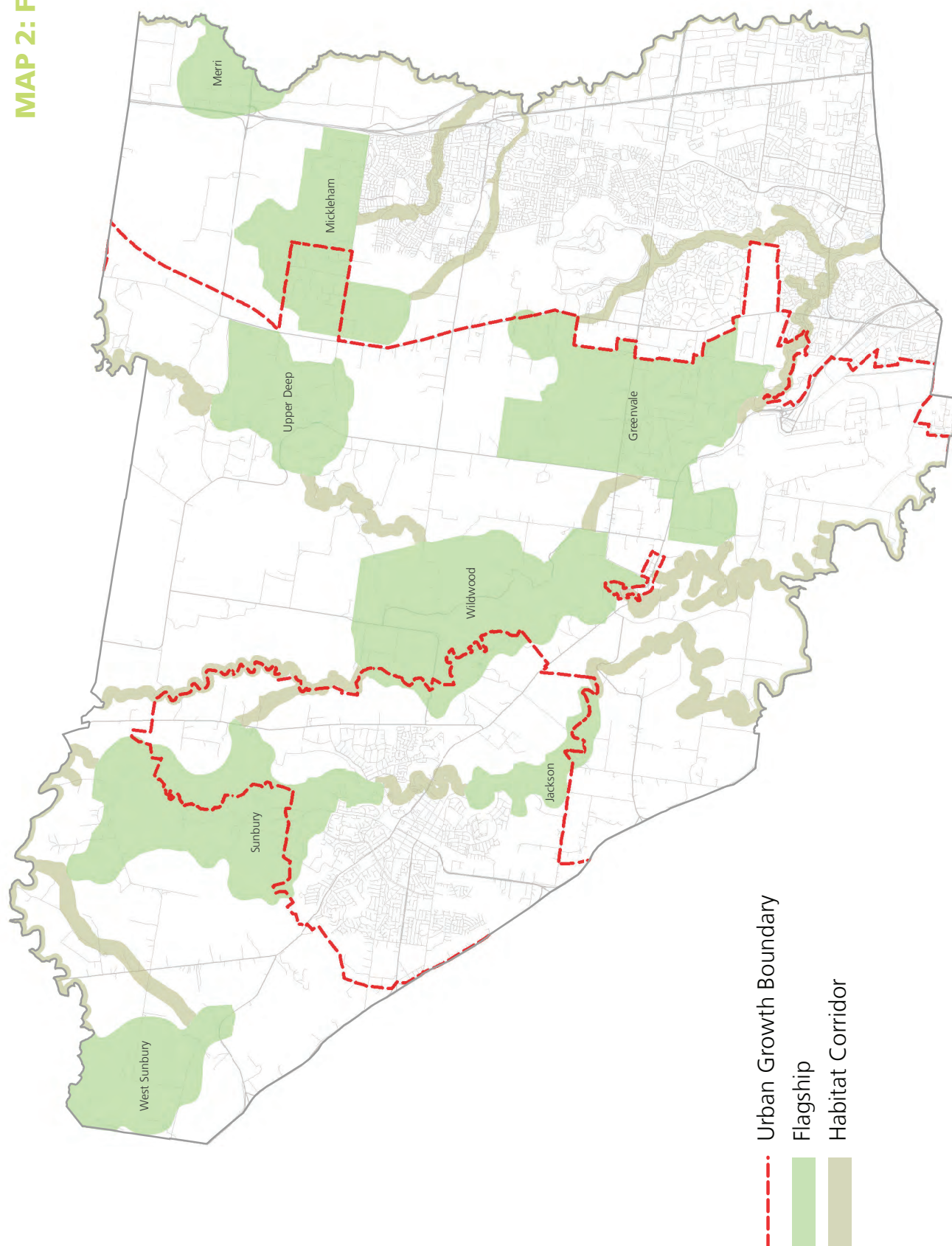
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MAP 1: PUBLIC CONSERVATION RESERVES UNDER COUNCIL MANAGEMENT

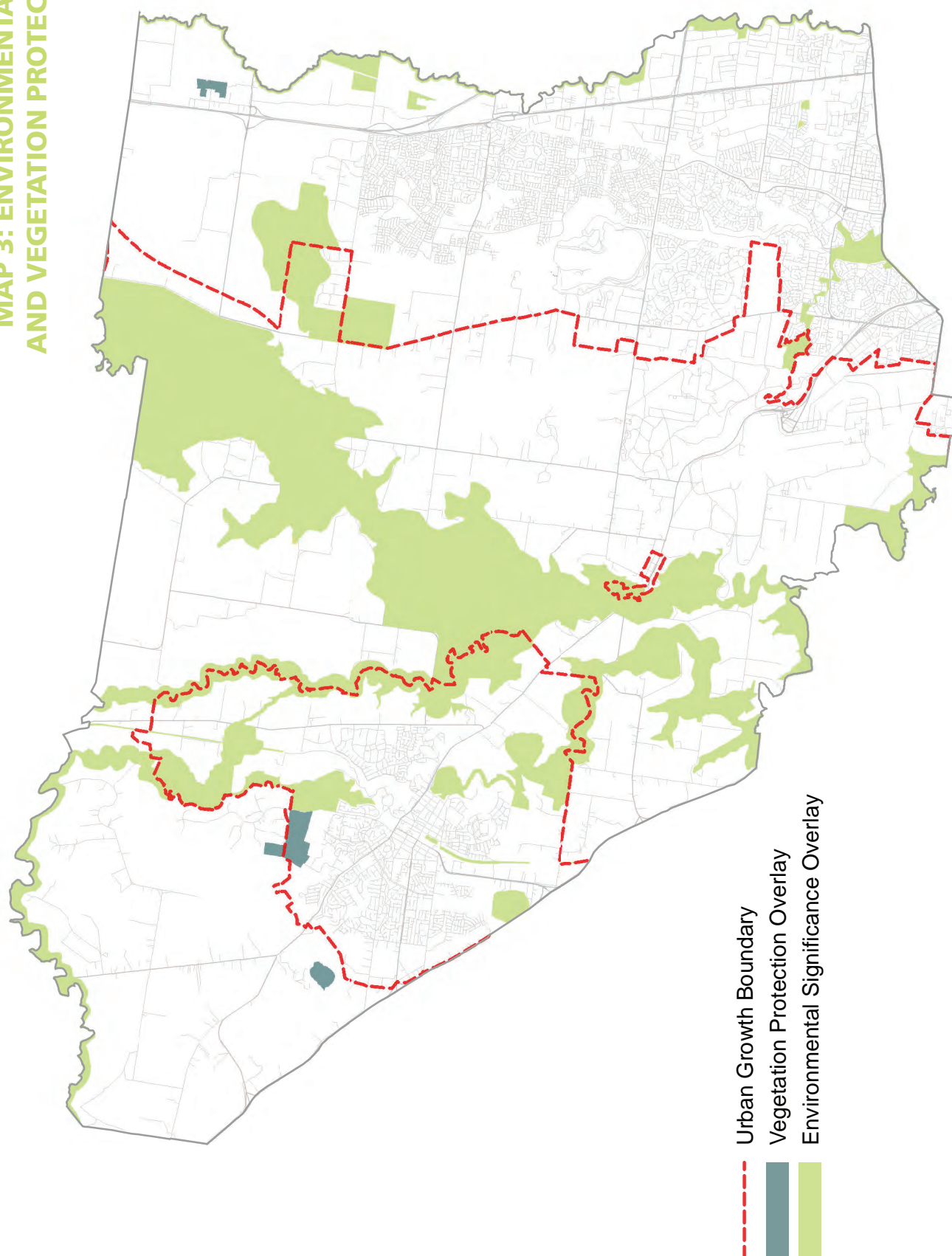


MAP 2: FLAGSHIP AREAS



1:150,000

MAP 3: ENVIRONMENTAL SIGNIFICANCE AND VEGETATION PROTECTION OVERLAYS



MAP 4: FLAGSHIP AREAS, BIOSITES AND OVERLAYS



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HUME CITY COUNCIL **SUBMISSION TO THE GROWTH CORRIDOR PLANS**

20 December 2011

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1. Introduction

Overall, Council is generally supportive of the urban structure shown in the Growth Corridor Plans (GCPs), including the general pattern of land use and infrastructure. However, it considers that as currently drafted, the GCPs is simply a collection of good ideas without the qualities and necessities of good planning to make these outcomes on the ground. Notably, Council considers that the GCPs lack certainty around the deliverability and achievability of the proposed development and infrastructure, lack of clarity around the required actions of others and the timing of these actions and failure to show any alignment with existing or proposed plans, funding and interventions by State Government.

1.1. Consultation Process & Timelines

Council's Involvement

Council welcomes the opportunity to provide comment on the long awaited Draft Growth Corridor Plans (GCPs) but remains hugely frustrated by the lack of direct involvement of Local Government in the preparation of the GCPs. At the beginning of the process, the Growth Areas Authority (GAA) committed to undertaking a more collaborative approach to the preparation of the GCPs. In its submission in November 2010, Council outlined its desire and willingness to commit resources to assist the State Government Project Team in preparing and reviewing evidence studies and the GCPs itself.

Beyond some high level briefings and discussions of emerging ideas, the GAA has chosen to exclude Council from the real process of developing the plan and the hard choices that needed to be made. As a result, the GAA have jeopardised the potential for a multi level Government approach to the delivery of this major growth in the Hume area. It is well known that other Government Agencies were significantly involved in the actual development of the plans themselves whereas Local Government has had minimal involvement. This shows the scant regard to the knowledge and expertise that Local Government can bring to the process. Of particular disappointment is the limited use of the considerable body of work undertaken by Council in its own HIGAP process which has explored in great detail, and with the community, the issues that affect Sunbury. It also shows the lack of understanding of the important role that Local Government plays in the planning, implementation and long term management of growth and new communities.

Insufficient Time for Responding

Council's submission is provided and has been prepared in the context of a totally unrealistic and inadequate timeframe to respond to such a significant document with potentially wide ranging and long term implications.

The current program of GCPs and Precinct Structure Plans (PSP) is yet another GAA led process which has no regard to the impacts both the timing and outcomes will have on Council. Council has recognised the importance of these documents and has committed significant resources in responding in the required timelines. Whilst Council has mobilised significant resources to respond in the timeframe required, the need to respond to 5 different GCPs and PSPs necessitates that this response is a preliminary one and Council reserves the right to make further submissions on issues that arise from further analysis and consideration of what is proposed. The timeframe and timing of the consultation period over November to 23 December adds further questions on the extent the GAA and the State Government are genuine in seeking and understanding the views of the community and key stakeholders such as local government.

In addition, to the questionable timing of the consultation process with Council, the approach to engaging affected communities in this process is also considered to be inadequate with no attempt to gain community views beyond publishing the documentation for comment. Had more time been available and more notice given, Council would have been willing and able to assist the GAA and State Government with gaining comment from the communities in Hume.

Finally, the lack of clear and transparent process for the review and consideration of submissions adds further weight to the view that this is a tokenistic consultation process. Such an attitude and approach is totally unacceptable given the significance of this plan and must be addressed if the GAA and State Government are genuinely interested in the views of the community and the Council's that represent them. Specifically, an independent process for the consideration of matters of substance must be arranged (see below).

1.2. Impact on Council and Future Communities

The haste in which the GCPs and PSPs have been prepared has resulted in significant gaps in the identification of the infrastructure required to support development and the level of funding proposed that will struggle to be appropriately filled. The rush to prepare the draft PSPs is proof that beyond the GCPs framework there is not the scope to address these gaps. This simplistic and cavalier approach to delivering growth of this scale and not resolving these gaps pays little regard to the burden and obligations this will place on Council, other agencies and future communities.

Council understands the issues and challenges of housing affordability and that this is the key justification for the rushed and opportunistic planning work currently being undertaken. However, it points to a significant body of evidence that shows that the issue of housing affordability is a complex one that is highly unlikely to be simply resolved by the approval of GCPs and PSPs without other measures. Council considers that existing and future communities are being

asked to pay too high a price for such an unsophisticated response to housing affordability.

Specifically, neither the GCPs nor the PSPs contain any discussion of approach to social housing or the management of tenure as other means of influencing housing affordability. More importantly, it places no requirement on the development industry to actually release the land held by those developers which benefit from the accelerated approval process and no requirement for tax or financial incentives.

Council considers the resources of the GAA would be much better spent developing the required broader approach to housing affordability in favour of the current one dimensional obsession with accelerating the approval process which merely adds another level of bureaucracy to the planning process and provides no guarantee that the cost of a house in growth areas will be any cheaper but guarantees that it will certainly be more expensive to live in.

1.3. The Need for an Independent Examination

The scale of the growth and the change enabled by the GCPs is considerable with 1.3 million people potentially calling these growth areas their home. The GCPs impact on the existing communities and existing infrastructure is also massive and long lasting as is the impact on the funding and capacity of State and Local Government, and numerous private agencies. Its importance should not be underestimated by State Government and is underlined by the fact that even excluding the construction of the OMR, Bulla Bypass and land costs, the road infrastructure costs in the Northern Corridor exceeds a billion dollars. Even taking into account the collection of funds via GAIC, the State Government would be still funding a massive shortfall.

Council strongly contends that all plans of this magnitude with such an impact should be considered independently by an appointed advisory committee or similar to ensure that they appropriately address matters of fundamental importance. Given the level of uncertainty and the amount of poorly resolved issues in the GCPs, particularly around the provision of critical infrastructure, Council contends that to not have the plan independently examined would be reckless and negligent on the part of State Government and highly inappropriate in a time of such financial uncertainty and fiscal restraint.

Matters which Council requests are considered by an independent body include:

- The suitability of the infrastructure proposed to support the scale of development and its required timing
- The capacity of State Government and private sector to deliver the scale of infrastructure proposed in an appropriate timeframe and in step with development

- The scale and location of employment land; and
- The scale and location of town centres

Council considers that this can be achieved without significant delay to the approval process as evidenced by the logical inclusions process and could be further accelerated by dealing with these issues on a topic by topic basis rather than party by party basis. This would thereby require no more than a day or so for each issue.

1.4. HCC's Submission – November 2010

In November 2010, Council made a submission to the GAA with regards to the proposed GCPs. It outlined the matters that Council considered should be addressed in the GCPs, the information it should contain and the direction it must provide if it is to fulfil its role within the Victorian Planning Policy Framework. Specifically, it outlined that to address the short comings of the previous Growth Area Framework Plans and the implementation issues of PSPs and previous plans, the following was required:

1. a more targeted and higher degree of intervention to mitigate the impact of climate change, peak oil, rising living costs, water security, obesity and ageing population on communities in growth areas;
2. a clearer understanding of how the existing areas and growth areas are intended to function and the impacts on existing areas as a consequence of the growth areas being developed;
3. a higher level of detail around the intended and required scale and nature of development and infrastructure (particularly regional and sub regional) as well as catchments for activity centres, large scale infrastructure and transport infrastructure;
4. a greater level of clarity on the function and management of large scale open space and greater clarity in the relationship between open space and conservation;
5. a far higher level of emphasis, direction and clarity on the planning, actions and funding required from service providers, developers and agencies to deliver sustainable development;
6. a greater level of certainty on the phasing and timing of development and infrastructure; and
7. direction, targets and requirements for specific areas to ensure that the PSPs and the new neighbourhoods contribute as required to the overall needs of the corridor.

Council is disappointed to see that many of its expectations and requirements have not been met in the Draft GCPs and submits that the COAG requirements for the strategic planning of capital cities are also not met. The main thrust of this submission outlines why these requirements are critical to achieving sustainable

communities into the future and how the GCPs should be revised before being approved.

The submission of last November also outlined the spatially specific issues and the spatial options and opportunities it should consider for the Northern Corridor and Sunbury/Diggers Rest Corridor, including a number of opportunities that have been identified for several years. Council is disappointed to see that for the large part these issues remain unresolved and the spatial options and opportunities remain no further advanced or closer to being deliverable than they were a year ago, or indeed several years ago. This lack of capacity to work through issues and progress opportunities to genuine potential outcomes is of concern to Council given the vast scale of growth proposed and the large sums invested by the State Government and the private sector in growth area planning exercises.

2. Overarching Issues and Changes Required

2.1. The Status and Role of the GCPs

The legislative status of the GCPs in the planning and delivery of the new growth areas is unclear. Specifically, it is unclear whether the GCPs are to be incorporated into the State Planning Policy Framework and the respective Planning Schemes of the relevant municipality or to operate in another unspecified capacity.

Whilst the actual GCPs document is silent on this matter the FAQ on the GAA website states that it is “expected” that the GCPs will be incorporated. This level of uncertainty at this stage of the preparation of the State Government’s only planning document for these areas is inappropriate, particularly given the scale and magnitude of the change it seeks to create. Importantly, it is not clear what status this document is to be given at the PSP stage and subsequent planning stages? It is not clear whether development proposals will be required to accord with the GCPs or merely have regard to them? It is particularly unclear whether development proposals that differ from the land uses **indicated** in the GCPs would be acceptable?

On the one hand, the document states that the GCPs “set the strategic direction for future urban development in the growth corridors” suggesting that future plans must comply with the content. However, on the very next page it states “the (growth corridor) plans are a tool to guide and inform future decisions regarding urban development and infrastructure” suggesting a much reduced status and a document that can be interpreted and used as it pleases the relevant agency.

The status and weight that is to be given to the concept plans contained within the GCPs is also a matter of uncertainty that needs to be clarified. Many of the concept plans show additional information and detail that is not shown on the main plans or addressed or referred to in the text. For example, the Public Transport Concept Plan shows lines and connections which are not part of the PPTN on the main plan. Are these lines and connections part of the future plan for the area or not?

The lack of clarity around the purpose, status and weight that will be given to the GCPs and the different plans contained in it, makes preparing a submission on its content highly problematic. Specifically, it is unclear how important this document is in future decision making and what weight or consideration will be given to its content by those involved in the future planning of the growth areas. It is therefore unclear how critical it is that matters are resolved now and how much later processes are expected to deal with the certainty. Council is firmly of the view that there are a number of matters which can only be addressed at this stage, notably decisions which extend beyond PSP boundaries or affect land beyond a PSP area.

To address this, Council request that the GCPs be revised to:

- confirm the status of the GCPs and its plans to provide the necessary clarity and certainty to all involved in the future planning and delivery of development and infrastructure in these areas as to how the GCPs is to be interpreted, particularly in the preparation of PSPs; and
- confirm whether PSPs must comply with the GCPs and how land uses and development proposals in a PSP area will be considered where it differs from the GCPs.

The role and purpose of the GCPs as it relates to the planning and funding of infrastructure is completely inadequate and is of great concern to Council. As outlined in Council's submission last November, Council consider that one of the primary roles of the GCPs must be to articulate what infrastructure is required to enable development to occur and to deliver sustainable communities, and how this infrastructure is to be delivered and funded. This is needed to provide confidence and certainty that the development being enabled by this plan is achievable, can and will happen, and will not leave communities without infrastructure because of inadequate forward budgetary planning or lack of capacity within State Government. It is also a requirement in the COAG advice on strategic planning in capital cities discussed below.

Council strongly contends that as **the plan** that proposes to enable the development of land to house 1.3 million people, it is absolutely vital that the GCPs identifies and articulates what infrastructure is critical to enable development to occur and make it sustainable, and what infrastructure is desirable to make future developments high quality places to live. And it is vital that its timing and delivery is articulated.

Based on statements in the document like "the GCPs only identifies infrastructure that **may be required**" and "the GCPs **do not commit** the government to delivering specific infrastructure or development projects or specific levels of provision", it is clear that GCPs has not achieved this primary role and the GAA have been unsuccessful in identifying how it will deliver the necessary infrastructure. As currently drafted, the GCPs is not even clear that fundamental infrastructure like intersections on major roads can be achieved and whether new train stations are to be funded or not.

This is simply not acceptable given the scale of development and infrastructure proposed and the long lasting implications it will have on the existing and future communities. Council submit that State Government **must** work to resolve this or risk placing some 1.3 million people with unacceptable infrastructure provision, and itself with an undocumented and unresolvable funding liability.

Council is also extremely concerned that the State Government agencies have no plans, budgets or other such means to ensure that the growth corridors will be

supported by adequate and comprehensive infrastructure provision even in the short term. With no new Transport Plan and no new funding committed to infrastructure, Council is the view that the GAA and State Government have not understood, or worse ignored, the implications of this plan and are prepared to leave communities isolated and exposed to rising living costs, peak oil and significant social and economic stress long into the future.

Even as a document to guide future infrastructure planning, the GCPs is flawed because no State Agency, Local Government, service provider or developer has any certainty as to whether development can or will progress without the infrastructure proposed in the plan or when it will be required. The lack of certainty around large state infrastructure is particularly problematic as no party is able to progress their planning with confidence it will be developed. This is particularly the case for facilities or development most suitably located adjacent to major transport infrastructure such as higher density housing and other Transit Oriented Development, major health facilities and community facilities. As a result, parties have to either plan for multiple locations or simply wait for the certainty to be achieved.

This uncertainty will almost definitely lead to delays to development and/or inappropriately serviced development and is of no benefit to developers, State Government, Local Government and future residents.

To address this, Council request that the GCPs clarify:

- **what infrastructure is critical to enabling development to occur and to occur sustainably;**
- **the status and funding commitment to that infrastructure from the relevant authority;**
- **what measures will be put in place to ensure that this infrastructure is provided in step with development; and**
- **what measures will be put in place if that infrastructure is not provided.**

2.2. Commitment and Capacity of State Government

State Government Infrastructure

Council notes and objects to the clear lack of commitment from State Government to deliver the GCPs. It notes that on nearly every page of the GCPs there are references to further work, measures or steps to be undertaken but no discussion of the nature of this work, the timeframe or the process for ensuring it is done in time to enable or support development. Council is concerned that large infrastructure items like the OMR, future train stations, future education facilities, future health facilities and future regional parks on which sustainable growth depend have no certainty around their deliverability, timing and affordability.

Council finds this lack of commitment and capacity from State Government unacceptable given the scale of the development that this plan will enable to progress and contends that it is extremely naïve and potentially reckless of State Government and State Agencies to think that they can allow this plan to progress without understanding or committing to developing the necessary budget, planning and actions to deliver the infrastructure necessary to enable the development to occur. Table 2.1 below shows that in the Growth Corridors that affect Hume, the cost of infrastructure far exceeds the money obtained from GAIC and this **excludes the OMR, the Bulla Bypass, Regional Parks and any land costs**. It shows that in the Northern Corridor, the shortfall could be as much as \$1,550 million and in Sunbury \$680 million. Over 30 years this is the equivalent of \$75 million per year or \$203,000 per day.

Table 2.1 – State Infrastructure Funding Shortfall

Northern Corridor			Sunbury Corridor		
Expenditure	GAIC Income	Shortfall	Expenditure	GAIC Income	Shortfall
\$2,200 mil	\$650 mil	\$1,550mil	\$900 mil	\$220 mil	\$680 mil

NB: Council estimated costs – excludes land costs, OMR and Bulla Bypass, regional parks

Such a shortfall is clearly not supportable particularly when the State Government budget shows a significant deficit and reducing revenue and income. And, when government priorities reflect an extensive number of infrastructure project commitments, none of which feature in the GCPs. The transport infrastructure costs alone from the GCPs will run into billions of dollars and place upon Vic Roads and Department of Transport a scale of investment far in excess of current budgets, and programs.

This lack of understanding of the budget implications of the GCPs raises serious concerns about the capacity of this State Government to fund and to deliver the GCPs, particularly in the short term and particularly if the private sector is unwilling or unable to deliver. It also raises serious doubts about the affordability of the future development, with Development Contributions Plans in the proposed Lockerbie PSP at \$20,000 per lot and potentially an additional 1.3 million people forced to drive long distances to access services as they live 30km and 50km from the CBD.

It also creates a fundamental question about what these new suburbs the GCPs allow will be like if the infrastructure is not delivered or is delayed and what State Government will do to avoid perpetuating the pattern of generations of families on the edge of Melbourne coping with inadequate levels of infrastructure, services and facilities compared to residents in established areas.

To address this, Council request that the GCPs clarify:

- what plans and actions will be prepared and undertaken to ensure that sufficient budget and funding is available to deliver the infrastructure needed to enable the new areas to develop and develop sustainably;
- the process proposed to ensure that the planning and capacity of State Agencies is adequate to enable the proposed development to occur and occur sustainably; and
- what measures will be put in place to ensure that the new communities are not left with inadequate levels of infrastructure, services and facilities.

Climate Change, Resource Scarcity, Peak Oil and Rising Living Costs

Council's submission in November 2010 outlined the importance of being proactive and committed to mitigating the impacts of the future issues of climate change, resource scarcity, peak oil and rising living costs that will affect growth area communities the greatest in the future. Specifically, it outlined the need to be more ambitious around self containment, to adopt and apply best practice measures to increase sustainable energy production and reduce water consumption, and to **deliver** high quality public transport alternatives to the private car.

Such an approach is also outlined in the COAG requirements for the strategic planning of capital cities and states that capital city strategic planning systems must address climate change mitigation and adaptation. This is another area where Council contend that State Government have shown no commitment or capacity to enable change beyond platitudes and good intention when it comes to delivery of local job opportunities, the adoption of best practice, and delivering genuine public transport choice.

Delivering Local Job Opportunities

Council is pleased to see that the GCPs is setting ambitious but supportable jobs targets in most growth areas (the lack of jobs in Sunbury is discussed in [Section 4](#)) in an attempt to enable greater self containment and local access to jobs. However, as with infrastructure, Council notes that the GCPs and the supporting documentation around employment land clearly separates itself from the responsibility for actual delivery of these jobs, leaving this to “decisions by individual businesses and public sector agencies” (Page 6 – Planning for Employment and Industry in Growth Areas”. In other words, the GAA and State Government relinquishes or absolves responsibility for the delivery of jobs at the publication of the GCPs with no guidance or articulation as to what will or could be enacted by others in the areas, including State Agencies.

Whilst such an approach would be appropriate if other plans outlined the measures and actions to help deliver the jobs in these areas, this is not the case. The GCPs is the only State Government document applying to these areas and the only means by which State Government can apply any influence on job creation.

Council contend that this lack of State Government commitment is unacceptable and objects to it approving a plan that enables 1.3 million people to live so far away from the CBD and adequate jobs provision without more measures to deliver local jobs. It particularly objects to the idea of exposing so many people to long commutes and the implications of peak oil and, in Sunbury, placing significant additional stress on the limited road and public transport network.

To address this, Council contend that before the GCPs is approved, the GAA and State Government must identify, prepare and commit to measures, interventions and strategies to:

- **enable the development of the identified employment land; and**
- **ensure that jobs growth keeps rate with population growth in these areas.**

Adopting Best Practice Measures

Council is disappointed to see that the GAA and State Government has shown little willing, desire or capacity to explore or deliver best practice energy generation and water conservation techniques now common place around the world. Whilst the notions under Principle 7 of the GCPs are admirable, the reality is that the GCPs has made no attempt to introduce measures to increase sustainable energy provision or reduce potable water use. This represents a significant missed opportunity to develop regional scale solutions and paves the way for 30 years of development to be implemented in the same way as it is now with a high dependency on coal. The implications of this lack of vision, foresight and capacity to act on climate change are significant given the scale of land and development being enabled through this plan.

To address this, Council seeks a far higher level of commitment from State Government with the GCP to addressing this matter in the coming year to ensure that this opportunity is not lost and future generations do not rue the inability of State Government to show leadership and action on this issue.

Genuine Public Transport Choice

Council recognises the level of funding that is likely to be required to deliver a public transport network and service frequency capable of appropriately supporting so much development. However, the extent to which the commitment

in the GCPs to deliver the identified PPTN has been 'watered down' is simply not acceptable given the scale of growth.

Such an approach has been adopted in the past and resulted in communities with hopelessly inadequate public transport provision resulting in higher living and social costs in these areas. Indeed, it is the well documented short comings of past approaches to developing land on the fringe that led to calls for a more integrated approach to planning that the GCPs and the GAA were expected to achieve. And yet, despite over two years of planning, the GCPs include no clarity or resolution and continue the trend of the GAA preparing plans with no definite guidance of the delivery of State Infrastructure. Council seriously questions how a plan which enables the development of land for 1.3 million people can progress any further when the required public transport network remains unresolved, uncommitted and unfunded?

It also questions whether the GAA are really addressing the issues that they were invented to resolve and fulfilling its role in growth area planning outlined in Section 46AR of the Planning and Environment Act or merely duplicating a process that could be undertaken by Local Government.

Council also contend that the PPTN must be planned comprehensively and at a regional or sub regional scale where appropriate catchments, patronage and network opportunities can be appropriately identified, understood and planned for and cannot be left to the PSP stage. It contends that leaving it to the PSP and reacting to development proposals misses the opportunity to create and deliver the very land use pattern described in 3.2.3 of the GCPs, and the level of patronage and quality of service capable of addressing the car dominance in growth areas. Further, the GAIC legislation means that there is no imperative for State Infrastructure to be resolved at the PSP stage as the development industry need only provide interim measures. This is very evident in the Lockerbie and Merrifield PSPs currently out for community comment in which there is no greater certainty around the ultimate PPTN than is shown in the GCPs. Specifically, the Merrifield PSP is not clear on the alignment of Aitken Boulevard and the bus rapid transit service to be delivered. Likewise, Lockerbie is not clear on the delivery of the proposed train station, the electrification of the train line or the frequency of train services.

For this reason, Council object to the GCPs stating that "detailed planning will be required to determine the most effective form for higher capacity additions to the public transport network" or that "the ultimate PPTN will be designed through PSPs". It argues that if State Government is serious about minimising climate change, mitigating the impact of peak oil and providing a quality of life capable of making the growth areas as liveable as the inner city areas, it must resolve and commit to public transport now. Alternatively, there needs to be a commitment from State Government that no PSPs are exhibited or finalised until the PPTN and the timing of its delivery is confirmed. Simply ignoring and delaying the

necessary commitment until a later unspecified date is not acceptable when the distances from the CBD are becoming so vast and the implications of non delivery so significant.

Council also submits that it is also not acceptable to have no clarity or certainty around the frequency of service that is anticipated to be necessary to service these large growth areas and the needs of some 1.3 million future residents. Without clarification of this matter, any measures to introduce appropriate land use solutions to maximise the accessibility to public transport are compromised and make such a frequency viable are compromised. Likewise, no public transport provider can appropriately plan with any confidence as to the required service it should provide resulting in significant delays between residents moving in and services being provided.

In short, the lack of certainty and commitment shown in the GCPs creates a spiralling set of uncertainty that undermines any genuine attempt to integrate land use and transport, any genuine attempt to minimise climate change, mitigate peak oil and deliver a public transport system that remotely compares to that in the inner city. It also undermines any benefit that the release of significant land for development might have on housing affordability as people continue to favour the inner city areas over growth areas, or alternatively undermines the affordability of the housing and transport package as people realise that affordable housing in growth areas goes hand in hand with spiralling private transport costs.

To address this, Council require that the GCPs be revised to:

- **clearly articulate the level of commitment State Government has to delivering the relevant parts of PPTN and the service frequency required to appropriately service the growth areas; and**
- **confirm that no PSPs will be finalised or implemented until the relevant parts of the PPTN are determined and there is certainty that State Government is prepared and able to commit to its funding and delivery.**

[Biodiversity Conservation Strategy](#)

Council note that the GCPs is based on a draft document, the Biodiversity Conservation Strategy, which has not been adopted and is still under exhibition. This Strategy has serious shortcomings in terms of accuracy which are outlined more in Section 3 and 4 and must be rectified and will affect the GCPs significantly. But more importantly, whilst the plan appears to mostly comply with the requirements of the federal government and meets the federal government's targets of 80%, it does not address state legislation, such as the treatment of species listed under the Fauna and Flora Guarantee Act or the Victoria's Native Vegetation Framework appropriately.

Significantly, vegetation removal is not being ‘avoided’ with a presumption that outside of designated areas, vegetation will be removed. When the vegetation is of high or very high conservation significance, Victoria’s Native Vegetation Framework (“Framework,” NRE, 2002) is clear that removal is not generally permitted. As an example, the Stony Knoll Shrubland and Plains Grassland in Kalkallo, which would effectively be removed by this strategy, is of high and very high conservation significance and would not have been removed if assessed in accordance with the Framework. Likewise, the protection of 80% of the Grassy Eucalypt Forest (GEF) in the north as well and compliance with the Framework must be demonstrated by naming the total amount of vegetation retained and removed (including those that do not form GEF) so that it becomes clear whether or not “avoidance” has actually been considered before offsetting is permitted.

Council request that the draft Biodiversity Conservation Strategy and the Draft GCPs must not be approved until these matters are addressed and the issues worked through.

2.3. Compliance with COAG Requirements for Strategic Planning of Capital Cities

Council notes the requirements for the strategic planning of capital cities outlined by COAG and strongly contends that the GCPs does **not** comply with these requirements and fulfil its role in providing the planning system COAG requires. Specifically, it contends that the GCPs fall hopelessly short of meeting the following requirements:

- **Integration across government agencies;**
- Provision of future orientated plans, including long term (15-30 year) integrated strategic plans, **medium term (5-15 year) prioritised infrastructure and land use plans**, and near term prioritised infrastructure project pipeline backed by appropriately detailed project plans;
- Addressing nationally significant policy issues, including: **climate change mitigation and adaptation**; efficient development and use of existing and **new infrastructure** and other public assets; **connectivity of people to jobs**; **social inclusion**; **health, liveability and community well being**;
- Provide for planned, **sequenced and evidence based** land release;
- **Clearly identify priorities for investment and policy effort by government** and provide an effective framework for private sector investment and innovation;
- Provide effective **implementation arrangements** and supporting mechanisms, including:
 - **clear accountabilities, timelines** and appropriate performance measures;
 - **coordination between all three levels of government**;

- **evaluation and review cycles that support the need for balance between flexibility and certainty, including trigger points that identify the need for change in policy setting;**
- **appropriate consultation** and engagement with external stakeholders, experts and the wider community.

(emphasis added)

Council contends that the GCPs and State Government are failing to meet and fulfil COAG requirements to deliver the planning system identified by COAG for capital cities and agreed to by State Government. It requests that the State Government respect and uphold its commitment to the COAG guidance by amending the GCPs. It would also be extremely disappointed if the Melbourne growth areas were to miss out on funding from Federal Government because it failed to meet its obligations under COAG for such a document.

To address this, Council request that the GCPs be revised to comply with the COAG requirements, notably by

- **confirming the status, commitment, funding and priority of infrastructure;**
- **confirming the sequencing and timelines for development and infrastructure;**
- **improving the approach and use of best practice to mitigate and adapt to climate change; and**
- **improving the level of certainty and including triggers for the need to change the GCPs.**

2.4. Lack of Detail

Council recognises the need to adopt a flexible planning framework for growth areas given the long term nature of the GCPs. However, it strongly objects to the extreme lack of detail outlined in the GCPs and the inadequacy of the guidance it provides, particularly around future population, future job requirements, catchment planning and the timing and sequencing of development. Council contends that this lack of detail is of no benefit to anyone involved in delivering the outcomes of the GCPs and will inevitably compromise the future planning of the growth areas. All involved in the preparation of plans in growth areas want to and need to understand key aspects around future dwellings, population, infrastructure, and timing and sequencing as these inform critical investment decisions.

[Future Dwelling and Population Numbers](#)

Council objects to the GCPs identifying such a significant range and margin for error for future dwelling numbers and future population within each growth

corridor as this has huge implications on the requirements for planning and funding of infrastructure, public transport provision and town centre investment.

Taking the Northern Growth Corridor as an example, the increase in population is identified to be anything from 221,000 people to 386,000 people meaning a margin for error of 165,000 people or 73%. As shown in the [Table 2.2](#) below, this difference has massive implications for the community infrastructure requirements needed to support this with potentially 20 additional multi purpose community facilities, 27 active sports ovals, 17 primary schools and 6 secondary schools required. This difference is clearly excessive and inappropriate and has major implications for the budgets of both State and Local Government.

[Table 2.2 – Local Infrastructure Requirements to Support 165,000 People](#)

Local / Neighbourhood Infrastructure	Requirement*	Cost
Multi Purpose Community Centre	20.6	\$100 mil
Active Open Space (2 ovals)	27.5	\$120 mil
Primary School	17.0	\$187 mil
Secondary School	6.6	\$325 mil

* based on GAA standards

[Table 2.3 – Regional Infrastructure Requirements to Support Additional Population](#)

Sub Regional / Regional Infrastructure	Requirement at 221,000 people	Requirement at 386,000 people	Difference
Specialist Secondary Health	4.5	9.5	5
Acute health	0.4	0.7	0.3
TAFE	2.2	3.8	1.6
Regional Park	1.5	2.5	1

* based on GAA standards

However, it is at the regional scale that Council has the most concern. Facilities and services like acute health, TAFE and Regional Sports require long planning timescales, have large land take and have specific locational requirements. Service providers responsible for planning, funding and delivering these facilities and services therefore need as much certainty as soon as possible as to the future population. A margin for error of 73% does not provide any measure of certainty or guidance.

Again taking the Northern Corridor as an example, [Table 2.3](#) shows that the difference in the Northern Corridor could be 5 specialist secondary health facilities, 1.6 TAFE and a regional sports facility. It also makes the need for an acute health facility much more important.

For transport, this population difference of 165,000 people in the Northern Corridor equates to 3.6 million additional trips per week¹ and potentially 500,000 additional vehicular movements per day on roads². For activity centres it could mean the need for an additional 300,000 sq.m of retail or the equivalent of 1 Principal Town Centre, 2 Major Town Centres and 12 Neighbourhood Town Centres based on the ratios assumed in the Activity Centre and Employment Planning Report (2010) undertaken by Essential Economics for the GAA

Council contends that this level of flexibility is clearly unworkable and questions why, and indeed how, the GAA have developed such a range. Notwithstanding the amount of potential variables, a plan of this importance should be far more certain on scale of undevelopable land particularly as the Amendment VC68 identified the largest areas. Likewise, the interrelationship between population and requirements for employment, open space, community infrastructure and road infrastructure means that a margin for error of 73% is simply unworkable, and renders the plan itself meaningless.

To address this, Council request that the GAA undertake a more thorough evaluation of the potential future development of the land identified and use this to provide far greater certainty on the future:

- **dwelling yield and population within different parts of the corridors;**
- **regional infrastructure required to service this population;**
- **catchment of activity centres, particularly in the Northern Corridor.**

Transport Analysis

Council is extremely concerned at the accuracy and depth of transport analysis that has informed the GCPs and the lack of publication of this work. It understands that the transport modelling work has only been undertaken at the 2046 end date with no consideration of the phasing of development and the capacity of the transport infrastructure to support development. Further, Council's review of the material on the PSPs for Merrifield and Lockerbie has identified that the VITM Model on which the GCPs is based has not been recalibrated and therefore the trip distribution assumed by the model is highly inaccurate. The Lockerbie PSP analysis also does not include the Lockerbie Train Station meaning that the traffic volumes being assumed are excessive and in turn the scale and cost of the arterial road network massively exaggerated. Such an approach to transport planning is not acceptable and will have significant implications on the cost of delivering infrastructure and development in these areas.

¹ Department of Transport, Official Patronage Series, March 2009 identified 22 trips per week per capita

² 90% of trips made by private car

Council request that the transport model be recalibrated and the work undertaken be published for community comment and consideration before the GCPs is approved.

Planning of Town Centres

Council also objects to the lack of detail in the approach to town centre planning beyond the limited advice in Section 3 of the GCPs. Specifically, Council objects to the lack of direction around the proposed scale of retail development that is envisaged in each of the new town centres, the compatibility of these centres and their potential to adversely compete with existing centres within the corridors. This is particularly the case in Sunbury where the proposed Major Town Centre on Sunbury-Bulla Road is given the same status as the existing town centre. Likewise, it is concerned that the proposed Principal Town Centre at Donnybrook and the proposed Major Town Centre at Merrifield will have an adverse impact on the Broadmeadows CAA and the Major Town Centre at Craigieburn.

To address this, Council request that the GCPs be revised to:

- **provide an indicative scale of development in each of the new town centres in the Northern Corridor and Sunbury Corridor;**
- **to provide an impact assessment showing that these centres will not adversely impact upon the existing town centres in the Northern and Sunbury Corridor; and**
- **reflect the role of Broadmeadows CAA as the most significant in a hierarchy of activity centres.**

Regional Open Space

Council's submission in November 2010 requested that the GCPs identify opportunities for Regional Open Space and outline who will be responsible for its delivery and management. It also requested that the GCPs provide clear direction of how the open space opportunities in regional parks would be married with the requirements to protect native vegetation and biodiversity in conservation areas. These requests come from experience of attempting to deliver open space in Hume where the efforts of Council have been frustrated by a lack of policy and financial commitment from Parks Victoria and DSE to their creation and the strict application of conservation measures at the expense of public open space.

Council is unclear from the plans and from reading the text in the GCPs where the regional parks are proposed and where it is proposed to just have extensions to the Metropolitan Trail Network (see below). It is also concerned that there is no commitment to the required funding of these parks or the work necessary to enable them. Council is also particularly concerned that these areas are shown to have only partial public access and are almost exclusively in areas of growling

grass frog investigation. It notes that DSE are charged with undertaken further investigation but is frustrated that no time line or process is proposed for this, particularly as Council can be a major player in planning and management of open space.

To address this, Council request that the GCPs be revised to clarify:

- **what level of financial contribution is or will be made available to deliver the identified regional open space from State Government departments;**
- **how DSE will determine the size, boundary, location and acquisition process for these regional parks, particularly how it will ensure public access and community benefit is achieved; and**
- **what role Councils will have in the process of planning, acquiring and managing future regional open space areas.**

Phasing & Sequencing

A key and fundamental role for strategic planning is to identify the phasing and sequencing of development to guide the investment strategies of infrastructure and service providers. This is particularly important for plans of this scale that have such significant financial implications for providers and such social implications for the future communities. Indeed, the GCPs recognises that “there is a real risk that infrastructure provision will be either unnecessarily expensive or will not be available when required” (pg 31) without appropriate planning. It also advises that “development of the corridor plans involved consideration of the way in which development might best be sequenced...” (pg 31).

Council is disappointed therefore that the GCPs does not include a more transparent and clear expression of the preferred sequencing and phasing of development in each corridor and as a result leaves those challenged with delivering infrastructure second guessing and having to react. This will inevitably lead to delay in the planning and delivery of development and infrastructure, as well as wasted resources.

Council particularly objects to the current approach of prioritising PSPs simply on the capacity of the developer to fund the PSP preparation in order to achieve quick land release with no regard to the challenges of delivering the necessary infrastructure or making best use of existing infrastructure. Such an out of sequence approach is unacceptable.

To address this, Council request that the GCPs be revised to include:

- **a plan that shows the proposed sequencing and phasing of different development areas; and**

- **an infrastructure plan for each corridor identifying what infrastructure will be delivered and when to enable the development to occur and ensure that it is sustainable.**

This is particularly important in the Sunbury Growth Corridor where the capacity of the existing road and public transport infrastructure is limited and will require upgrades to enable development to occur. Likewise in the Northern Corridor, the distance between the proposed areas at Merrifield, Lockerbie and Beveridge and existing employment, retail and services makes the early delivery of public transport critical to avoid future communities being dependent upon their cars. This is discussed more in [Section 3](#) below.

Guidance and Requirements for PSPs

Council believe that whilst matters of detail need to be resolved at the PSP stage, it is highly appropriate for the GCPs to provide specific guidance on the intended outcomes in specific locations to ensure that PSPs that are prepared contribute to the aspirations and vision for the whole corridor. By providing guidance at this stage, the GCPs would ensure that the outcomes sought from specific areas are understood by all involved in the preparation of PSPs at an early stage and ensure that their efforts and resources are focused on making these outcomes happen rather than debating what they should be. This has significant benefits in speeding up the PSP process as well as subsequent planning processes by reducing the ambiguity that currently exists within the plan. In particular, it should guide specific outcomes around urban design considerations, employment land requirements and open space and infrastructure provision that are relevant only to particular areas.

Such guidance is also critical to explain and demonstrate how the Principles identified in Section 3 of the GCPs are intended to be applied within different contexts and avoid them being a nice collection of words at the start of a document which are not utilised.

To address this, Council request that the GCPs be revised to identify specific guidelines and requirements for different parts of the growth corridors where specific outcomes are sought.

Specific recommendations for such guidance for the Sunbury and Northern Corridor are provided in [Section 3 and 4](#) of this submission.

3. Northern Growth Corridor

The submission now deals with the Northern Corridor. The first part of this section outlines Council's concerns around the lack of consideration about how the entire Northern Corridor is proposed to function before dealing with the specific headings in the GCP for the Northern Corridor in turn.

3.1. The Function of the Entire Growth Corridor

Council's previous submission outlined the need for the GCPs to assess, determine and outline how the entire growth corridors would function as a result of the proposed development outlined in the GCPs and consider the impact on the existing areas. This was stressed as being particularly important in the Northern Growth Corridor where the relationship between new growth and existing activity centres was likely to be significant and where there is a significant amount of undeveloped land.

Council is frustrated and disappointed to see that the GCP for the Northern Corridor focuses almost exclusively on the new development areas with little discussion of the way the whole corridor is anticipated to function and with limited consideration or guidance on the impact of the development of the new areas on the existing areas.

In the Northern Corridor, there is no articulation of the role of each of the town centres in the corridor and no discussion on the impact that new development will have on the role of the Broadmeadows CAA or the Craigieburn Major Town Centre. There is also no discussion of the roles that Melbourne Airport and the Broadmeadows CAA will play as major employment nodes and general high trip generation destinations (this is discussed below).

Council particularly objects to the limited attempts to identify, articulate and direct different roles and uses to each of the new town centres beyond the designation of PTCs and MTCs and the simplistic advice in Section 3. This is extremely worrying as it suggests that no assessment has been undertaken to determine the potential positive and negative contribution that this plan could have on Craigieburn Town Centre and the Broadmeadows CAA that are still developing and subject to critical investment decisions by both the public and private sector before they can fulfil their identified roles.

It is also at odds with the approach taken in the South East Corridor where the role of the Dandenong CAA is more clearly articulated. Such an approach could significantly undermine the return on the significant investment of State Government and Council in the planning and development of Broadmeadows and is unacceptable given the importance of this CAA in providing critical jobs and services close to future residents through the whole Northern Corridor of Melbourne.

There is also no attempt in the GCPs to articulate the role of Donnybrook town centre as distinct from Merrifield town centre. Council does not believe that the role, scale and list of uses can and should only be articulated at the PSP stage opening up the potential for a ‘first in best dressed’ approach to resolving this issue. This is not considered acceptable as it will inevitably lead to stagnation and reduced investor confidence, both in Merrifield and Donnybrook as well as the Broadmeadows CAA as investors fear the implications of the other centres.

To address this, Council request that the GCPs be revised to:

- **consider any changes to the role of the existing centres and to clearly articulate their role in the Northern Corridor, especially the Broadmeadows CAA;**
- **articulate more clearly the role, scale and timing of development planned for each of the different future town centres, particularly Merrifield and Donnybrook; and**
- **confirm that the new town centres should not adversely impact on the existing town centres and, if appropriate, place triggers upon development of different town centres which prevents inappropriate competition for a period of time.**

3.2. Issues, Opportunities, Vision & Objectives

Council generally supports the text within the Context and Vision section of the Northern Corridor and the issues identified to be addressed and managed through growth. However, Council is disappointed that the relationship between new development and the existing and planned urban area is not covered in more detail. Broadmeadows, Melbourne Airport and Craigieburn Town Centre are all major destinations that could be critical to meeting the future requirements of the growth areas both in the short term and the long term but could equally be adversely affected by poorly managed growth.

Council request that the Context and Vision include text along the following lines:

“Ensure that the growth corridor enables and benefits from accessibility to Broadmeadows, Melbourne Airport and Craigieburn and does not adversely impact upon their future development”.

3.3. Landscape & Environment

The GCPs are informed by a draft document, the Biodiversity Conservation Strategy for Melbourne’s North Growth Areas, which has not been adopted and is still under exhibition. This Strategy has serious shortcoming which must be rectified before the Growth Corridor Plans are finalised. Matters that need to be addressed and reflected in the Northern Growth Corridor are as follows:

- Recognition of the significant biodiversity qualities in the Kalkallo Township (see Kalkallo below);
- The reduction of the buffer along the Merri Creek without appropriate assessment (see Kalkallo below)
- Classification of the areas in Mickleham South Employment Area on Figure 15 as Plains Grassy Woodland and not Plains Grassland;
- Classification of the areas in the Lockerbie PSP and Kalkallo Township area as Plains Grassland and not Plains Grassy Woodland;
- The presence of the Earless Dragon and Swift Parrot and the importance of the woodland/grassland mosaic as habitat for these species; and
- The importance of the habitat in the Northern Corridor for Striped Legless Lizard

Council also requests that the following areas of GEF and Plains Woodland are enlarged to protect the maximum extent possible of this vegetation and achieve the 80% requirement for protection of GEF:

- Mt Ridley West – Area marked as D2 contains Grassy Eucalypt Woodland of the Victorian Volcanic Plains. The entire area of woodland must be retained.
- Part of the property located at 750 Craigieburn Road East. The several Eucalyptus camaldulensis and Eucalyptus ovata present at the property have been poisoned; however, along with the native understory, they still offer significant habitat value.
- Greater part of the Mickleham Road Woodland, including the areas of higher habitat score towards Mickleham Road and further north, to join with the planned reserve north of Mt Ridley Road.

Council objects to the GCPs or PSPs being approved until these issues are amended and the implications worked through.

Council notes that this section also includes a number of errors that stem from it copying the same format as the Western Growth Corridor that should be amended.

3.4. Open Space

With regards to open space, Council notes that in the Integrated Open Space Concept Plan and Section 5.3.4 make reference to a number of regional open spaces across the Northern Corridor for passive and active open space. Council supports this and submits that the Merri, Malcolm and Kalkallo creek system and the Moonee Ponds, Yuroke, Brodie creek and the Greenvale Reservoir system both present important opportunities to form regional networks for both biodiversity and passive recreation purposes for the Hume and wider Melbourne community.

However, it notes that the GCPs and the Biodiversity Strategy provide conflicting and inconsistent messages about the extent to which these spaces are intended to be regional parks or open space. Notably, the main plan only shows the Quarry Hills Park as proposed regional open space with the other areas shown as something else. Likewise, Section 5.3.4 refers to the areas on the Concept Plan as “suggested”, “under investigation”, “potential” and “proposed” whilst at the same time including statements that suggest a higher degree of commitment like “it **will** incorporate” and “**will** be connected”. For active regional open space it concludes that “the delivery of these facilities will need to be further investigated before any decisions can be made”.

The process for resolving this is also entirely unclear with both the FAQ and Section 3 advising that “DSE will determine the size, boundary location and acquisition process for these regional parks”. Council is not clear whether all of the potential regional parks in the Northern Corridor will be subject to this work by DSE or not. Equally, it is not clear whether the Merri Creek is identified as a regional park or just part of the MTN.

This leaves the regional scale open space planning for the Northern Corridor completely unresolved and the stakeholders and potential delivery agencies entirely uncertain as to the status or the level of commitment from State Government to these spaces. Delivering regional open spaces requires a cross agency approach to planning, funding, delivery and management that the GAA and GCPs need to assist in coordinating to avoid the Northern Corridor continuing to be significantly underserved into the future.

As a significant stakeholder and agency for the delivery and management of these potential spaces, Council request that the GCPs address this by:

- **confirming the status of each of the regional open spaces shown in the Open Space Concept Plan and the level of commitment and funding from State Government Agencies to each of these; and**
- **outline the nature of the investigations and the further work to be undertaken for each of these open spaces so all parties and agencies involved in the planning, funding, delivery and management of these spaces are clear as to what further work is actually required to deliver them.**

Council also notes and supports the identification of an extensive MTN through the Northern Corridor on the Indicative Open Space Concept Plan. However, Council is concerned that much of this runs alongside creeks which are also identified as Growling Grassfrog Corridor Investigation areas and areas of other important species. Experience of seeking to deliver similar trails along other creeks in the Hume area have been frustrated and/or abandoned due to the strict approach taken by DSE to the scale of public access through such corridors.

Where it has been achieved, it has been a narrow trail of limited public amenity with limited provision of additional open space so valued along other creeks in Melbourne, notably the Yarra and the Maribyrnong.

Council does not see its role is to manage areas exclusively for the preservation of a single species, e.g. Growling Grass Frog or Golden Sun Moth. The responsibility to ensure that these Nationally Significant (EPBC) species endure is a national one, and must be funded and managed by the State or Federal Government. However, where conservation reserves form part of an appropriate passive open space area, Council is willing to protect and manage these areas with sufficient funding. Conservation reserves that exclude the community from access and recreation have no place in Council's asset management systems.

To address this, Council request that the GCPs include text which ensures that the design of the MTN and any regional open spaces proposed through areas of important flora and fauna provides sufficient passive recreation and open space in addition to the MTN and conservation reserves.

[Merri Creek](#)

Council note that the 200m buffer for growling grass frog along the Merri Creek is to be reduced to 50m through the proposed Donnybrook town centre, principally to reduce the sense of separation from the town centre and the train station. Council recognises the need for this good connectivity but considers that further work is required before the scale of reduction can be supported. Specifically, Council object to any reduction until further work is undertaken to determine the required land take for all of the following:

- flooding, erosion and water treatment
- passive open space, and walking and cycling connectivity
- roads and bridges; and
- appropriate habitat protection

It requests that the GCPs be revised to remove the reference to the 50m and outline the need for the above work to be undertaken as part of the preparation of the Locekerbie PSP.

3.5. Creating Communities

[Clarity on Size of Communities](#)

Council believes that the anticipated dwelling yield in different parts of the Northern Growth Corridor need to be included to inform infrastructure planning of service providers and agencies and to inform the scale of activity centres. Whilst Council recognises that this will change as further planning is done, it is entirely

appropriate and absolutely necessary at this stage to provide greater clarity of the proposed scale to inform the planning of the many other parties and agencies involved in the delivery of the growth areas. It also contends that the catchment of proposed and existing town centres should be shown to help agencies guide the most appropriate community facilities and services to the most appropriate centres.

To address this in the Northern Corridor, Council request that this detail be added to the Community Concept Plan on Page 62.

Design and Sense of Place

Council notes the attempt to specify elements that could be drawn upon to help create a character and identity in the growth areas and to integrate existing settlements. Council supports this and suggests that this be expanded and applied more specifically to different parts of the Northern Corridor to ensure that this is reflected in the PSPs. Specifically, it seeks specific advice to inform the PSP for Lockerbie to ensure that the Kalkallo settlement is appropriately integrated.

Council is concerned that the GCP for the Northern Corridor identifies Aitken Boulevard as being designed as a boulevard without clarification of what this means. Council has spent years developing and securing the cross section for Aitken Boulevard to ensure that it can support bus rapid transit in the future and this should not be compromised.

Council request that the reference to Aitken Boulevard be amended to include the following text:

“Aitken Boulevard will be designed as a high quality public transport corridor capable of supporting bus rapid transit based on the cross section identified and being implemented in Craigieburn and other areas of Hume.”

Kalkallo

Kalkallo is a township which has an old and inappropriate subdivision layout, no reticulated services and only a handful of local retail and commercial services. It also has excellent biodiversity values and a number of areas are managed by DSE. Current planning policy attempts to control lots sizes and provide a more appropriate road and urban structure but a comprehensive approach to the township's planning is required. The planning of the Northern Corridor provides the ultimate opportunity to resolve a number of these issues and provide a more certain and comprehensive planning response for the township.

Despite the positive wording in the GCP to this effect, the Lockerbie PSP provides an inappropriate response to the Kalkallo township and fails to address any of the issues or opportunities outlined above.

To address this Council request that the GCPs be revised to require that the following outcomes be enabled for Kalkallo through the preparation of the PSPs:

- **Ensuring that the township is appropriately connected to reticulated services;**
- **Confirmation of the future land uses in Kalkallo, including the existing and potential retail and commercial facilities;**
- **Retaining and enabling appropriate access onto the major road network, notably the Hume Freeway and Donnybrook Road;**
- **Providing connectivity and permeability through new neighbourhoods to local and regional facilities; and**
- **Identifying and enabling appropriate treatments and interfaces with the Kalkallo Creek and the Kalkallo Common which both contain important biodiversity.**

Regional Community Health and Education

As noted above, the GCPs provide no certainty on the need for regional infrastructure, including health and education facilities. Rather it suggests that provision may be made in the PSPs for such uses. This approach has proven to be unsatisfactory as the Draft PSPs for Lockerbie and Merrifield provide no certainty or clarity around the following:

- What education and health uses are proposed?
- How land will be safeguarded once development starts? Who will pay the landholding costs?
- Will the land be acquired and by which agency(s)?
- Will it be a DCP contributions or GAIC?

This matter must be further considered and greater clarity, guidance and measures outlined in the GCPs to address these issues.

3.6. Employment & Town Centres

Council is concerned that the catchment of the future Major Town Centre in Merrifield is principally limited to the area of residential to its south east and any additional residential in and around the Major Town Centre. It is particularly concerned that this will impact upon the vision for this area developed by MAB for the town centre and particularly the potential to make the Kalkallo Retarding Basin a major feature, destination and attraction in the Northern Corridor.

The catchment is principally compromised by the identification of commercial and industrial development to the east and north east of the Kalkallo Retarding Basin. The industrial land in this location may also have implications for surface water run off into the retarding basin which could compromise its potential as an area for water based regional active sports. It also significantly compromises the catchment for the higher capacity public transport along the extended Aitken Boulevard.

Council has reviewed the supporting material which justifies the large amount of employment land and contend that the scale of commercial and industrial development throughout the corridor is excessive. It particularly contends that the land to the east of the retarding basin should **not** be pursued for employment at the expense of securing a suitable catchment for the Merrifield Town Centre, a wider community use for the Retarding Basin and sufficient catchment to enable Aitken Boulevard to be a higher capacity public transport corridor.

As outlined in Section 2, the sheer size of the range adopted in the GCPs for the scale of development, population growth and required jobs is too large for a plan of this significance and importance. In the Northern Corridor the difference is 52,000 jobs or 77% which is the equivalent of 1,170 hectares of industrial land (based on the Essential Economics assumption of 45% of jobs being in industrial areas and assuming a 20 worker per hectare ratio). In other words, if the development yield, population growth and required jobs were at the bottom end of the range, 1,170 hectares of the proposed 1,700 hectares of industrial land would not be required. This is the equivalent of the entire proposed Beveridge Employment Area and clearly has significant scope for refinement.

Notwithstanding this, Council contend that the adopted figure for industrial land for the Northern Corridor is excessive at 1700ha given that there is 1,700ha of existing land identified by Jones Lang Laselle as being available. At a conservative 20 workers per hectare this is the equivalent of 68,000 jobs and would therefore meet the entire lower end of the jobs range assumed by the GAA. If industrial land were to provide 45% of the total jobs as anticipated it would provide its share of over 150,000 jobs and thereby far exceed the upper end of the GAA target.

Council also contend that the multiple assessments prepared for the GAA have not given due regard to the job opportunities that exist within the entire Northern Corridor. As a consequence, the assessments have underestimated the excellent potential for jobs growth in Broadmeadows, in Epping and in Craigieburn Town Centre. Whilst in sectors of the economy outside of the industrial category they are clearly significant and suggests that the GCPs need not adopt an approach of oversupplying industrial land in the Northern Corridor to meet the jobs growth.

Table 3.1: Implications of changing the land allocation east of Kalkallo Retarding Basin

No of Jobs with no industrial land east of retarding basin	133,000 jobs*	GAA target met
No of jobs with mixed use land east of retarding basin	137,000 jobs*	GAA target met
No of years industrial land supply with no industrial land east of retarding basin	44 years**	GAA target met
No of years industrial land supply with mixed use land east of retarding basin	46 years**	GAA target met

* assuming 20 workers per ha and 45% of jobs on industrial land

** assuming current take up of industrial land remains constant at 67ha per annum

Another source of jobs and industrial land supply that has been underestimated is at Melbourne Airport which is expected to employ 55,000 jobs and has approximately 250ha of industrial land available. This again shows that the GCPs need not adopt an approach of oversupplying industrial land to meet jobs growth or Melbourne's wider future industrial land needs.

Council request that the GCPs be revised to reallocate the 360 hectares of land to the east of the Kalkallo Retarding Basin to residential or mixed use rather than industrial and commercial.

Council contend that this will:

- provide an appropriate residential catchment for the Merrifield Town Centre and realisation of the vision for Kalkallo Retarding Basin; and
- provide necessary catchment for the provision of higher capacity public transport along Aitken Boulevard.

As shown in [Table 3.1](#), these changes mean that the GAA jobs capacity figures are still exceeded and the targets of one job per household and a 40 year industrial land supply is also achieved if available industrial land is developed.

3.7. Transport

Public Transport

Council welcome and support the identification of higher capacity public transport, particularly the extension of the Craigieburn Line and the addition of a train station at Donnybrook. It also welcomes and supports the identification of Aitken Boulevard as a higher capacity route, operating initially as a BRT service with potential to be upgraded in the future to a higher capacity transport mode.

However, Council is concerned that these remain as concepts and simply lines on a plan with no greater clarity about the feasibility or achievability than was the

case 3 years ago. It is particularly concerned that the GCPs states that “detailed planning will be required to determine the most effective form for higher capacity additions to the public transport network” with no clarification of what this involves, when it will be undertaken and what this means for the timing of development. It is also concerned that this public transport infrastructure and service provision has no policy or funding commitment from State Government or any timetable for its delivery when it is clearly so critical to enabling new development to commence and make it sustainable.

In the case of Aitken Boulevard, work Council has undertaken to extend the road reservation south to connect to the Broadmeadows CAA, to Melbourne Airport and north to Beveridge has identified that significant funding will be required from State Government to construct the road and to provide the necessary bus services to make it fulfil its intended role. Likewise, to extend the electrification of the train line to Donnybrook and beyond and to construct new train stations is a significant cost which is not included in any existing transport budgets.

Council notes that the alignment of Aitken Boulevard stops at Johnstone Street and does not continue to the Western Ring Road as per the safeguarded alignment. Council requests confirmation that this is the State Government’s position and requests that the work to justify this is published. Specifically, Council wish to understand how State Government have balanced the following:

- The visual and environmental impact on the Broadmeadows Valley Park
- The need to provide a high quality public transport connection to the Broadmeadows CAA and Melbourne Airport; and
- The need to provide an appropriate arterial road network.

Council contend that this lack of resolution, lack of certainty and lack of commitment at this stage of planning for the growth areas is unacceptable given the importance of providing infrastructure in step with development. This is particularly the case in the Hume area of the Northern Corridor where two large precincts, Lockerie and Merrifield, are now being planned at the PSP stage with no greater clarity around the feasibility, timing and delivery of the required public transport services and infrastructure to serve them.

Council objects strongly to the GCPs and these PSPs progressing without further clarity around the provision of this public transport infrastructure as it will inevitably result in large communities being developed without adequate public transport provision.

To address this, Council request that the GCPs be revised to include the following:

- **the policy status and level of State Government commitment and funding to the delivery of each component of the public transport network in the Northern Corridor;**

- the work that is required to confirm the feasibility and achievability of the various public transport infrastructure components necessary to service the area;
- a staging and sequencing plan showing when the new development areas are anticipated to be developed and when it is proposed to deliver the public transport infrastructure and services to meet the demand;
- the measures that will be taken to ensure that there is not an unacceptable time lag between development commencing and public transport infrastructure and services being provided, including measures to slow down the rate of development or bring forward necessary funding;
- the measures that will be taken to revise the GCPs should this public transport infrastructure not be delivered.

Council also request that the GAA publish the transport assessment work that demonstrates that the public transport network proposed can adequately support the scale of development proposed.

Council also welcomes and supports the identification of the need to connect people living in the Northern Corridor to Melbourne Airport illustrated on the Public Transport Concept Plan. However, it is concerned that this connection remains so unresolved in a plan of this significance and importance in shaping future planning for Northern Melbourne, particularly given the scale of future employment proposed at Melbourne Airport.

Council has for many years advocated for a direct connection from Aitken Boulevard to Melbourne Airport through the development of the Attwood Connector. This would remove the need for residents on this important west flank of the Northern Corridor to change modes of transport multiple times as is currently the case.

Council request that the GCPs be revised to confirm the approach proposed to connect the Northern Corridor to Melbourne Airport.

Council also request that State Government increase the engagement of DOT and Vic Roads to enable this link to occur.

Road Network

As with the proposed public transport network, Council is concerned that the proposed road network is unresolved and uncertain with regards to feasibility, policy status, timing and funding. Council is particularly concerned about the status and commitment to the delivery of Aitken Boulevard and Mickleham Road.

To address this Council request that the GCPs be revised to confirm:

- **the policy status and State Government commitment to the road infrastructure upgrades proposed;**
- **the staging and sequencing plan showing when the new development areas are anticipated to be developed and when it is proposed to deliver the road infrastructure to meet the demand;**
- **the measures that will be taken to ensure that there is not an unacceptable time lag between development commencing and public transport infrastructure and services being provided, including measures to slow down the rate of development or bring forward necessary funding; and**
- **the measures that will be taken to revise the GCPs should this public transport infrastructure not be delivered.**

Council also request that the GAA publish the transport assessment work that demonstrates that the road network can adequately support the scale of development proposed.

Council notes the need for investigation of interchanges along the Hume Freeway and is concerned that matters of such significance remain unresolved in a plan of this importance, particularly when PSPs for these areas have been prepared and also show no resolution. If these interchanges are potential show stoppers to development then the GCPs, and certainly the PSPs, should not proceed to avoid development occurring that is simply not appropriately accessible. If the issue is one of design then the GCPs should at least confirm the intended function of these intersections (i.e. connect Gunns Gully Road to the Hume Freeway or provide a public transport connection over the Hume Freeway).

To address this, Council request that the GCPs be revised to confirm:

- **the extent to which this uncertainty around the interchanges is a show stopper for development; and**
- **that the design of the interchanges will be confirmed and resolved before the PSPs in this area are approved.**

3.8. Urban Development Investigations Areas

Council notes that the GCPs includes areas for further investigation though urban development is considered suitable. This includes land either side of the Merri Creek and Melbourne Rail line. Council is disappointed that these areas which have been known to the GAA for several years remain merely under investigation with no greater clarity in the GCPs than there was then. It considers that the GCPs needs to give greater clarity around the timing and nature of this investigation work so that all parties have greater certainty about the extent to

which it needs to consider this area in any future infrastructure, service or other planning.

To address this, Council request that the GCPs be revised to outline for each investigation area the nature of the investigation involved and the proposed timeline for their determination.

4. Sunbury Diggers Rest

The submission now deals with the Sunbury Diggers Rest Corridor. Council is pleased to see that some of the content of its HIGAP documentation prepared to date has been reflected in the GCPs, particularly in the vision but is frustrated and disappointed that much has been ignored despite the significant evidence which underpins it. The latest document, the Preferred Options document, is available to view from – http://www.hume.vic.gov.au/Whats_On/Your_Say/HIGAP

Council welcomes and strongly supports the identification of potential Regional Parks, the northern and southern road links across Jacksons Creek and the identification of an extension to the Smart Bus Service to connect Sunbury Residents to Melbourne Airport and Broadmeadows. However, Council is extremely concerned with the approach being adopted for employment and activity centre planning in Sunbury which is at odds with the vision in the GCPs, Council's HIGAP and the needs and concerns of the Sunbury community. In particular, Council is concerned that the State Government has not fully understood the importance in ensuring that Sunbury does not become a town of over 100,000 people where the vast majority commute to work, and have to leave the township to access education, health and other services. It is also concerned that the GCP for Sunbury has adopted an approach to future town centre planning that could undermine the primacy of the existing town centre and in the process undermine the whole character of the township.

The first part of this section outlines Council's concerns around the approach to employment, activity centres, as well as the lack of certainty around infrastructure. The remainder then deals with the specific headings in the GCPs in turn.

4.1. Employment

State Government are acutely aware of the significant out commuting (10,000 people by car everyday) that currently occurs in Sunbury due to a lack of job opportunity and job diversity in Sunbury and the implications that this has on the road network. With peak oil and climate change very real threats to the quality of lives of future residents, it is critical that the very highest priority is given to delivering jobs in Sunbury. Balancing housing growth with jobs growth is not just a planning ideal, it is an absolutely fundamental means by which sustainability is achieved, and climate change, peak oil and rising living costs mitigated.

Council contend that a jobs target of 8,000 to 15,000 jobs for a future additional population of 60,000 to 102,000 people is highly inappropriate and insufficient if Sunbury is to be anything more than a commuter town and if the State Government are serious about sustainability and quality of life. It is significantly below the 18,000 to 28,000 jobs identified in the Essential Economics Report. It is also significantly below the 22,000 additional jobs target identified by AEC

Group's Economic Assessment for Sunbury which is considered to be aspirational but a realistic target to achieve.

Council is concerned that the scale of jobs targeted by the GCPs will undermine efforts of Council and others to promote jobs growth, protect industrial land and attract investment. It is concerned that it condemns future residents of Sunbury to an out commuting and potentially car dependent lifestyle that could have significant negative social and economic implications should petrol prices increase as anticipated. It will also place unacceptable strain on the road and public transport infrastructure which requires significant investment from State Government.

Council also contend that it will significantly undermine the future strength of the housing market in Sunbury as future buyers choose between housing opportunities close to a potential job versus housing opportunities requiring significant commuting.

To address this Council request that the GCPs be revised to:

- **include a higher jobs figure for Sunbury more in line with the AEC Group Economic Assessment and confirm the anticipated out commuting for Sunbury that may occur; and**
- **outline what economic development measures the State Government will adopt to increase jobs growth in Sunbury.**

4.2. Industrial Land

Council supports the identification of 210 hectares of industrial land which broadly aligns with its preferred approach of 180ha of additional industrial land in growth areas. However, Council is concerned that in identifying the locations chosen, the GCPs has adopted a very narrow, negative and employment second approach to the future planning of Sunbury. Specifically, it is concerned that the sites chosen do not offer the market the optimal sites and as a result significantly undermine the opportunities for inward investment and jobs growth. Specifically, it limits the potential of Sunbury to local business growth and does not provide opportunity for regional or metropolitan businesses. This is in stark contrast to the approach in the other corridors where the land identified for industrial development is more appropriately located, namely with immediate access on to existing or proposed major road network.

Council also notes that Sunbury is the only corridor where the scale and nature of employment land is not articulated, suggesting a lower priority, commitment and overall understanding of the employment needs of Sunbury.

Land at Diggers Rest

Specifically, Council objects to the identification of industrial land south of Diggers Rest which is divorced from the Calder Freeway and of limited commercial viability. Work commissioned by Council identified that this land was too distant from the major road network and did not offer the necessary exposure to attract major businesses. Council is also concerned that by locating industrial development south of Diggers Rest, the GAA is presuming and forcing a future outcome on the land further south which is outside of the UGB and was subject to debate at the Logical Inclusions Advisory Committee where all parties recognised that significant further work was required to enable its development, particularly around accessibility and the flight paths for Melbourne Airport. Secondly, and as a consequence of this, Council is concerned that the GCPs is preventing any short to medium term opportunities for employment development in the Sunbury Diggers Rest area until this further work is undertaken.

In contrast AEC Group identified the land immediately adjoining the Calder Freeway in this location as the preferred location as it offered significant potential for transport and logistics development and had the qualities necessary to attract regional scale companies. Council understands and supports the objectives of Melton Shire Council to make Diggers Rest a viable and self contained neighbourhood and the constraints of the flight paths. However, Council contends that neither of these matters are undermined by relocating the industrial land immediately adjoining the Calder Freeway. Specifically, as proposed in the Sunbury HIGAP preferred options paper, by allocating 40ha in this location, there is sufficient land to provide up to 4,000 lots to the west of the existing township whilst protecting the flight path. This would also have the added benefit of not dragging heavy goods traffic through the residential area or requiring such and extensive upgrade to Vineyard Road as would be the case in the location proposed in the GCP for Sunbury and Diggers Rest area and the Draft Diggers Rest PSP.

As an accelerated PSP it also offers significant potential to bring a hugely competitive and viable employment location to the market in the short to medium term and provide a much needed increase in the level of competition of industrial land in Sunbury.

Land at Vineyard Road

Council also objects to the exclusion of land along Vineyard Road immediately adjoining the Calder Freeway. This site was again identified in work by AEC Group on behalf of Council as having significant potential to compete with other locations around Melbourne and provides a genuinely viable opportunity to attract regional scale investment and businesses. Council understands the landowners preference would be residential on this site and have concerns about the visual impact and topography but Council have examined this and consider

that the development would be commercially viable and any visual impact easily mitigated. It also does not contend that developing this area for industrial development would adversely reduce the catchment and viability of the new train station as it would still have a significant catchment within 1km and over 12,000 additional lots would be within easy access when the Southern Link is constructed. With the completion of Elizabeth Drive it would also serve a large part of the western area of Sunbury.

[Land at Sunbury Bulla Road](#)

Whilst Council supports the identification of land on Sunbury-Bulla Road for industrial development, this site is again not considered to be a site that will realistically attract regional or metropolitan investment, particularly until the OMR is constructed. It is also constrained in the short to medium term owing to the limited capacity on the Sunbury-Bulla Road. The Council work identified that this site was well suited to providing for local businesses and for businesses associated with the quarry and the future recycling activities proposed. Council's recommendation is therefore that this site be included but be limited to around 50ha.

[Land on the Northern Edge](#)

Council is at odds to understand the rationale behind the inclusion of industrial land on the northern edge of Sunbury given its distance from the major road network and very long term nature.

[Logical Inclusion Land to the South of Sunbury](#)

Council contend that the land to the South of Sunbury that is currently outside the UGB but with immediate access on to the Calder Freeway and potentially on to the OMR should be identified for employment potential in the longer term. This land would be excellently located, being proximate to the major road network, a point acknowledged by the GAA's own assessment of the site as part of the Logical Inclusions process. If or when this land is brought inside the UGB, the employment land identified should be reviewed.

To address this, Council request that the GCPs be revised to include the following industrial land allocations:

- **40 – 50 hectares of industrial land at Diggers Rest on land immediately adjoining the Calder Freeway;**
- **50 – 60 hectares of industrial land on Vineyard road for a mix of light industrial and potentially business and commercial uses;**
- **50 hectares of industrial land on Sunbury Bulla Road with the potential long term opportunity for a 50 hectares subject to demand; and**

- **Long term potential for approximately 135 hectares of industrial land outside the UGB to the south.**

4.3. Sunbury Town Centre and Proposed Major Town Centre

Council welcomes the strong emphasis in the vision that “Sunbury Town Centre will grow in importance as a regional hub, and will be complimented by a series of **smaller** town centres that meet **local** shopping and other needs of residents” (emphasis added). It also welcomes the identification that all development will need to “feed off the existing Sunbury Town Centre”.

However, Council notes that Sunbury Town Centre is not proposed to change from a Major Town Centre to a Principal Town Centre to reflect its increasing regional role and potential to service a catchment of over 100,000. It also notes that another Major Town Centre is proposed in the east contrary to the clear advice in the Vision and the text on page 102 which states “the new residential precincts in the south, east and north Sunbury will be supported by new Local Town Centres”. This contradiction is further confused by the text on page 104 which states:

“An additional Major Town Centre is identified on the Sunbury-Bulla Road. This centre will provide convenient access to retail and other services for the residents in the eastern and northern parts of Sunbury. It will compliment the main Town Centre by providing for a wider distribution of sub regional scale retail services, so that the main town centre can continue to grow as the regional centre and the community focus for the town.”

Such contradiction and lack of clarity is not acceptable as the consequences of this relationship between the existing Sunbury Town Centre and new centres have significant implications for the viability and vitality of Sunbury Town Centre. Specifically, if the proposed Major Town Centre is allowed to grow too large or too quickly this could stall and prevent the very growth in Sunbury Town Centre sought in the GCPs, sought by Council and sought by the Sunbury community.

Work undertaken by Hassell in partnership with Charter Keck Cramer on behalf of Council has shown that there is capacity to grow the Sunbury Town Centre to accommodate additional retail, commercial and community uses of a scale typical of a Principal Town Centre. With a future population of over 100,000 and a significant wider catchment, Council contend that it is highly appropriate that the Sunbury Town Centre be identified as a Principal Town Centre in the GCPs.

The Charter Keck Cramer work also showed that Sunbury is currently ‘punching above its weight’ with many of the large national multiple retailers operating at below average turnover. It also identified that only in the longer term, if Sunbury grows to in excess of 100,000 people and is able to attract the high street

retailers, would there be sufficient expenditure and demand to warrant a sub regional retail node or any town centre above a Local Town Centre.

This work on Sunbury Town Centre has been reflected in the Sunbury HIGAP work undertaken by Council and subject to community consultation. Council's 'Preferred Options' Document proposes that a large Local Town Centre be located on Sunbury-Bulla Road comprising potentially 2 supermarkets, additional speciality retail and commercial development to maximise its clear commercially viable location and large catchment. A Major Town Centre is shown as a preferred potential long term requirement further up Lancefield Road with the emphasis and role of this centre being principally about providing an alternative greenfield location for large scale community infrastructure in the long term should potential sites in the town centre not be achievable.

Council's work has also identified a need for a dedicated bulky goods node to provide a planned response to the demand for such development in the Sunbury and wider region. By providing a single centre, it would help consolidate such activity in one location reducing the need to travel. It would also help alleviate inappropriate pressure for such development on the existing or proposed industrial land. Council has considered different locations and identified land on the eastern side of Vineyard Road proximate to the station as being the most suitable due to its access to the wider region via the Calder Freeway and the train station, its proximity to similar development, and the capacity of the landscape to absorb such a development.

To address this, Council request that the GCPs be revised to:

- **Show Sunbury Town Centre as a Principal Town Centre;**
- **Identify a Major Town Centre on Lancefield Road adjoining the proposed train station in the longer term;**
- **Identify the proposed town centre on Sunbury-Bulla Road as a large Local Town Centre;**
- **Identify a bulky goods node on Vineyard Road; and**
- **Include measures to ensure that none of the supporting centres being developed adversely compete with the Sunbury Town Centre.**

4.4. Road Connections

The Bulla Bypass

The capacity for Sunbury to grow sustainably and without inappropriate impacts on the road network in Sunbury is dependent upon upgrades to the road network. Sunbury-Bulla Road is the most constrained with vehicular flows exceeding design capacity, particularly through the township of Bulla.

Council welcomes the identification of the Bulla Bypass in the GCPs and notes the work that Vic Roads are undertaking to plan for this important infrastructure. However, it also notes that the investigation work will not be completed before the GCPs are finalised. Council has significant concerns with this approach, particularly as this would be a likely constraint to development in Sunbury and should be confirmed before the GCPs is finalised. At the very least, the GCPs needs to confirm the importance in enabling significant growth in Sunbury, particularly on the eastern side of the town, and outline what measures it will take to ensure that development does not occur that would result in inappropriate conditions on the Sunbury -Bulla Road.

To address this, Council request that the GCPs be revised to:

- **Confirm the importance of the Bulla Bypass in enabling further development in Sunbury to occur, particularly on the eastern side of Sunbury;**
- **Outline what controls will be placed upon the scale and location of development in Sunbury until:**
 - **the investigation of the Bulla Bypass is completed and it is a committed and funded scheme; and**
 - **the Bulla Bypass is constructed.**

The Northern and Southern Link Roads

Council welcomes the identification of the Southern Link and the Northern Link as proposed road links. However, it is uncertain what status these roads are given in the GCP for Sunbury and Council contend that it must confirm the status and importance of these roads in enabling new development to occur and occur sustainably. It submits that both these roads are crucial as road, public transport, walking and cycling connections to create an orbital route for Sunbury and to connect different neighbourhoods and alleviate the through traffic in the Sunbury Town Centre. It contends that the Southern Link must be provided to enable development in the south east and east of Sunbury to commence and provide short term access to the Calder Freeway as an alternative to the Sunbury-Bulla Road in the short to medium term until the Bulla Bypass and OMR are constructed. Likewise, the Northern Link is required to enable the development in the north east in the long term to provide an alternative access to the town centre to the existing Macedon Street.

Council is also uncertain about the accuracy that is intended to be shown for these links and the nature of the investigation work that is being, or is proposed to be, undertaken. Council has undertaken some initial work to assess the potential alignments of these road links and contends that there are two potential alignments for the Southern Link that provide a feasible crossing of Jacksons Creek. These are shown in the Sunbury HIGAP 'Preferred Options' document.

Council have reviewed the alignment shown in the GCPs for the Southern Link and consider that it is not feasible due to the topography. Council also contends that it is inappropriate for the Southern Link to connect to Vineyard Road at the point shown as this will compromise the potential to achieve an appropriate connection to the existing Jacksons Hill Estate and could also compromise the potential to provide a connection under the viaduct if the spacing between intersections on Vineyard Road are too close. Both these implications are significant for the development of the UGZ land in Sunbury South and therefore Council considers that the alignment in the GCPs should be reconsidered and revisited if it is meant to be an alignment adopted in the PSP preparation.

Council's work on the Southern Link has also identified that it will have significant cost, visual, cultural and environmental impacts that make a thorough and considered investigation necessary. It submits that this investigation needs to be completed **before the PSP** for this area advances significantly and certainly before it is approved as its implication on the urban structure of the PSP could be significant.

To address this, Council request that the GCPs be revised to:

- **Confirm that the Northern and Southern Link are required to enable Sunbury to appropriately function and for new development to occur;**
- **Confirm the status and State Government commitment to these links;**
- **Outline what the investigation work is proposed to address and when this work is to be undertaken and completed.**

4.5. Phasing and Sequencing

Central to the issues that Council have with the GCP for Sunbury is the lack of direction on the phasing and sequencing of development. As outlined above, providing new employment opportunities and delivering transport infrastructure in step with development is critical in Sunbury.

Council note and generally support the boundaries of the proposed PSPs and believe that the priority for the preparation of PSPs and their delivery should be PSPs 1095 and 1074. Whilst there are issues of fragmented landownership and limited developers to fund the preparation of these PSPs, the land to the west and south can be developed quickly with minimal impact on road infrastructure and help support and enable the early delivery of the much needed Jacksons Hill Train Station and Southern Link.

This proposed phasing and sequencing is shown in Councils Preferred HIGAP document.

4.6. Large Scale Community Infrastructure

Council has recognised for some time that Sunbury needs to grow and increase in population to enable it to support both existing and new infrastructure. Council has therefore supported and promoted the growth of Sunbury through *Melbourne@5Million* and *Delivering Melbourne's Newest Sustainable Communities*.

Council welcomes the identification of the need for post compulsory education provision in Sunbury and the notion that the Sunbury Town Centre would be an appropriate location for such a facility. However, it is considered that the GCPs should identify land for a campus based facility now as an alternative to the town centre to provide the necessary flexibility into the future. Council submits that land adjoining the proposed train station along Lancefield Road is a suitable site as this is unlikely to be developed until the longer term and would be well located adjoining the proposed train station and Northern Link.

Council is concerned that the GCPs has not explored and resolved to a higher level of certainty the need for health facilities that should be provided in Sunbury at a future population, potentially in excess of 100,000. Council submits that a site in the same location as the site for post compulsory education should be safeguarded at this time for review in the future when needs are finalised.

To address this, Council request that the GCPs be revised to include land adjoining the train station along Lancefield Road be safeguarded into the future for a post compulsory education facility and potential large health facilities to be reviewed once the needs and opportunities within the town centre are determined.

Council notes the identification of a potential regional active open space adjacent to Jacksons Creek and the note that this is under investigation. Council welcomes the identification of such a facility in principle but is extremely disappointed and frustrated that it has not been involved in determining what this facility is and where it is located. Council have undertaken a community infrastructure assessment and identified the need for a regional sports facility to address shortfalls, principally in athletics and hockey. With soccer, football, tennis and cricket being catered for already or being planned for now, the nature of any regional sports facility is therefore likely to be very different to Casey Fields or other large scale regional active sports which principally comprise multiple sports fields.

Council's HIGAP work has identified that land near to the northern train station and Northern Link on Lancefield Road would be far more suitably located as it can maximise the benefits of public transport and road connectivity for residents in Sunbury and the wider region as well as collocation with schools and any potential university/TAFE can be maximised.

To address this, Council request that the GCPs be revised to include land adjoining the train station along Lancefield Road be safeguarded into the future for a regional sports facility.

4.7. Vision & Objectives

Council supports the Vision and welcomes how closely it reflects the vision identified by Council with the community in the Sunbury HIGAP work it has prepared.

4.8. Landscape and Environment

As with the Northern Corridor, the Draft Biodiversity Strategy is not sufficiently complete. Specifically, it does not appropriately reflect the importance of the habitat in the Sunbury area for the Earless Dragon and Swift parrot as well as the Striped Legless Lizard. This must be addressed and reflected in the GCPs for Sunbury, particularly following the sighting of the Earless Dragon in nearby Wildwood.

4.9. Open Space

Regional Open Space

As with the Northern Corridor, Council welcomes the identification of Regional Parks in Sunbury but is unclear on the status and commitment from State Government to their delivery. Council's HIGAP documentation identifies the significant scale of the opportunity to provide Regional Park and open space in Sunbury to safeguard important landscape and increase community enjoyment of the unique setting of Sunbury. It is a big part of Council's vision and is working with various agencies to deliver numerous related projects in the township that would be greatly assisted by greater commitment from State Government.

Council request that the GCPs address this by:

- **confirming the status of each of the potential Regional Park areas along Jacksons Creek and what is proposed along Emu Creek;**
- **confirming the level of commitment and proposed funding from State Government Agencies to their delivery; and**
- **outline the nature of the investigations and the further work to be undertaken so all parties and agencies involved in the planning, funding, delivery and management of these spaces are clear as to what further work is actually required to deliver them.**

Council's concerns relating to the MTN outlined in Section 3.4 above are also relevant to Sunbury and critical to achieving Council's vision that Sunbury should have highly accessible and renowned open spaces.

Landscape Values

Sunbury has a unique and highly valued landscape which includes hilltops, ridgelines, creeks and escarpments. This landscape provides an extremely high level of visual amenity for the residents and ensures that Sunbury has a strong rural outlook. These qualities are highly valued by the community and contribute enormously to Sunbury feeling more like a country town than a suburb of Melbourne. Council has completed a Landscape and Visual Assessment which identifies the significant impact of new development and need for improved protection

Council notes and welcomes the recognition of these qualities in the vision and in the discussion of Sunbury in Section 7 of the GCPs. It also welcomes the identification of areas of landscape value on the main plan and the Indicative Open Space Concept Plan. However, it is concerned that the GCP only identifies some of the hilltops of Sunbury and the parts of the escarpment along Emu Creek and does not acknowledge the landscape and visual qualities of escarpment along Jacksons Creek or the extensive ridgelines to the north west of Sunbury.

Council is also concerned that the GCP for Sunbury provides no measures or means to protect these features beyond identifying them as areas of landscape value on plans.

To address this, Council request that the GCPs be revised to;

- **include the escarpment along Jacksons Creek and the entire length of Emu Creek as well as the ridgelines and hilltops to the north west of Sunbury; and**
- **include measures and guidance to ensure that the planning at the PSP stage protect these features from development and maintain the high quality visual and landscape amenity of the township.**

4.10.Transport

In addition to the comments above on the road network, Council has significant concerns with the lack of clarity on the status, planning, funding and commitment of State Government to the potential train stations in Sunbury that will be critical to ensuring sustainable travel patterns in Sunbury, particularly given the low job targets and projections in the GCPs. Indeed, the work undertaken by AEC Group, identified that even if its job target of 30,000 jobs for Sunbury were achieved there would still be some 16,000 people having to leave Sunbury to access work

at a future population of 100,000 with as many as 30,000 choosing to travel due to limited job diversity.

Such commuting numbers are significant. Whilst the electrification of the Sunbury line will assist, to support the scale of growth a greater level of commitment is required to the delivery of new train stations and new services. In particular, Council is concerned about Sunbury being overly reliant on just the single train station in the town centre which already suffers from parking and traffic issues.

Council also seeks early commitment to the train station to the south of Jacksons Hill to help enable, promote and deliver Transit Orientated Development in this location.

Likewise, Council is concerned with the lack of commitment to the delivery of bus services to connect Sunbury to the Northern and Western Corridors despite this being a big justification for the low jobs projections in Sunbury. The number of people working at Melbourne Airport now and in the future makes a bus connection from Sunbury to Melbourne Airport critical.

To address this, Council request that the GCPs be revised to confirm the status, timing and funding of train stations and the provision of train and bus services to connect residents in Sunbury to Melbourne.

5. Greater Collaboration with State Government

Council's submission in November 2010 outlined Council's commitment to work and collaborate with State Government, notably the GAA, in the preparation of the GCPs. This included the offer for an officer from Council to attend meetings and reviewing draft material and evidence documents. The principle behind this was to ensure that maximum and most efficient use of resources, and exchange of knowledge and information.

Council is disappointed that the GCPs have been released without this arrangement being explored and with very limited input from Council officers.

Moving forward, Council believes that there are a number of areas of further work that Council are well placed to assist State Government in furthering the planning, delivery and management of change.

In the Northern Corridor this includes:

- The planning of Aitken Boulevard to connect land in Mitchell to Merrifield, Craigieburn and Broadmeadows Town Centres and Melbourne Airport;
- The planning, delivery and management of regional parks and other high quality open space areas, including the Kalkallo Retarding Basin;
- The planning and preparation of PSPs, including high quality employment sites and town centres; and
- Identifying the optimal phasing and sequencing of development to ensure that infrastructure is delivered in step with development, notably public transport infrastructure.

In the Sunbury/Diggers Rest Corridor this includes:

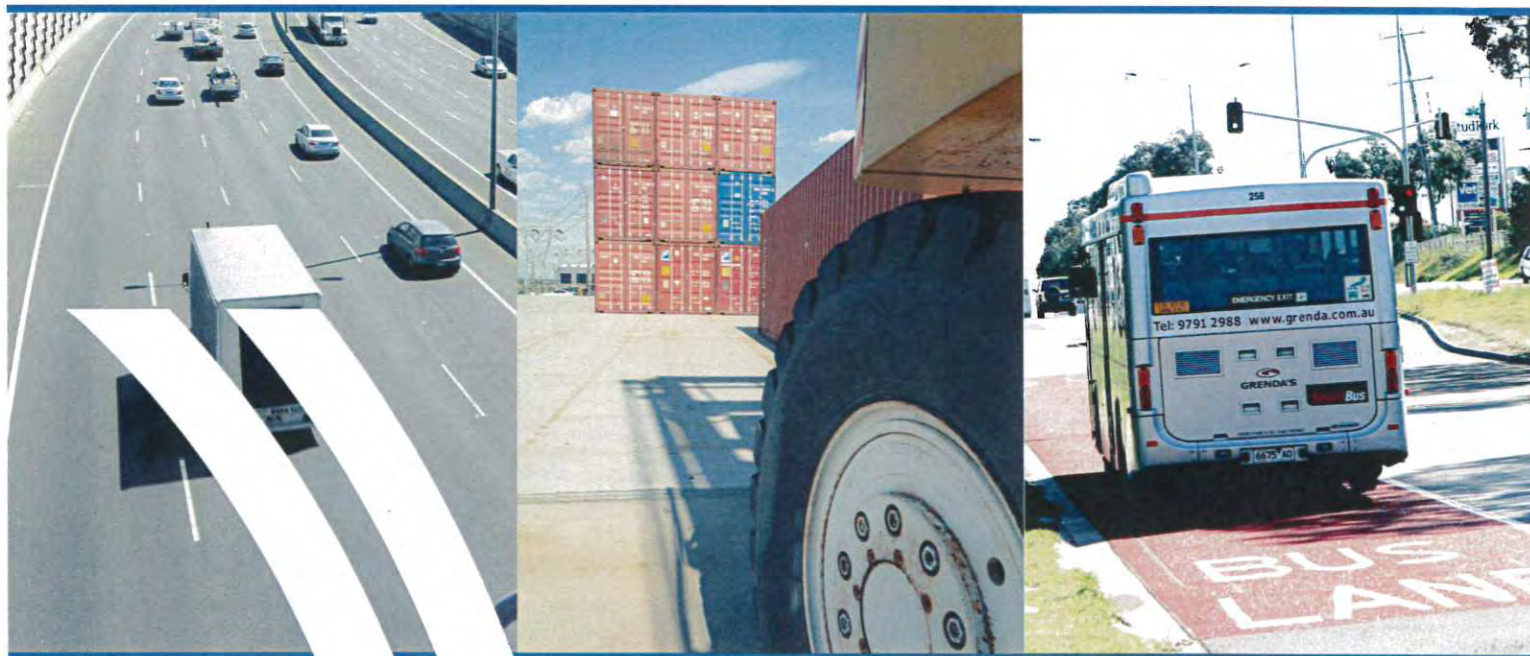
- The investigation and planning of the Southern and Northern Links;
- The preparation of plans and measures to protect the rural qualities and visual amenity of Sunbury;
- The planning, delivery and management of regional parks, notably Jacksons Creek and high quality open space links throughout the township;
- The planning and preparation of PSPs, including high quality employment sites and neighbourhood town centres;
- The planning and delivery of large scale post compulsory education and health facilities in Sunbury; and
- Identifying the optimal phasing and sequencing of development to ensure that infrastructure is delivered in step with development, notably road and public transport infrastructure.

Council note that much of the work that the GAA undertake is focused on structure planning and effectively duplicates the work Council undertakes. To better maximise resources, Council are again willing to offer significant resource

to assist in the delivery of the growth corridors through the management of the preparation of PSPs, particularly in the Sunbury area where Council has undertaken significant work already to inform their preparation. It believes that this would enable the GAA to undertake work which genuinely adds value to the growth planning of Melbourne around:

- coordination and delivery of State Infrastructure in step with development;
- exploring alternative ways to fund state and local infrastructure
- measures to improve housing affordability beyond land availability;
- measures to improve resource efficiency and energy generation in new developments;
- measures to improve climate change mitigation and adaptation
- monitoring and assessing the benefits and impacts of different initiatives in the PSP areas being developed now – notably the success of intersections, the success of walking and cycling.

----- END -----



HUME CITY COUNCIL **SUBMISSION TO THE LOCKERBIE PRECINCT STRUCTURE PLAN**

Friday 23 December 2011

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**Submission to Growth Areas Authority
On the November 2011 consultation version of the: Lockerbie Precinct Structure Plan**

1. OVERVIEW:

The following submission is provided in relation to the November 2011 consultation version of the Lockerbie Precinct Structure Plan (PSP) and Amendment C161 to the Hume Planning Scheme. Hume City Council (Council) is concerned that the documentation as provided will be detrimental to the proper and orderly planning of the area. Council objects to the Precinct Structure Plan and opposes the 20 Part 4 Amendment processes it understands the GAA intends to pursue in relation to this amendment. The assessment of this PSP should follow the proper planning process and should be reviewed by an Independent Planning Panel.

2. GENERAL COMMENTS:

2.1 Insufficient time for responding

Council's submission is provided and has been prepared in the context of a totally unrealistic and inadequate timeframe to respond to such a significant document with potentially wide ranging and long term implications.

Whilst Council has mobilised significant resources to respond in the timeframe required the need to respond to 5 different Corridor Plans and Precinct Structure Plans necessitates that this response is a preliminary one and Council reserves the right to make further submissions on issues that arise from further analysis and consideration of what is proposed.

The timeframe and timing of the consultation period from 21 November to 23 December raises questions on the extent the GAA and the State Government are genuine in seeking and understanding the views of the community and key stakeholders such as local government.

In addition to the questionable timing of the consultation process, the lack of process to review and consider submissions after they have been made points to a tokenistic consultation process and that the GAA and State Government and not genuinely interested in the views of the community and the Council's that represent them.

Council has serious concerns regarding why this PSP is not following the standard planning scheme amendment process. Council has received only verbal advice and nothing in writing from the GAA regarding why this PSP is being dealt with as a 20 Part 4 amendment, and it is not clear why it is being dealt with in this manner.

It is also not clear how this PSP could be considered prior to the Corridor Plans being finalised.

2.2 Concern over the level of funding required and its accuracy

The haste in which the PSP's have been prepared has resulted in significant gaps in the identification of the infrastructure required to support development and the level of funding proposed. Indeed the rush to prepare the draft PSP's has seen an infrastructure list prepared without the necessary work to determine the correct scale and cost of infrastructure required. This cavalier approach pays little regard to the burden and obligations this will place on Council to deliver the required infrastructure over time.

2.3 Impacts on the community in the future

A cavalier approach has also been taken to the impact this planning work will have of on the community into the future. Unresolved infrastructure planning and the lack of commitment to the provision of State Infrastructure will not only affect Council's ability to provide infrastructure and services that meet the requirements and expectations of residents but also place a significant financial burden on future generations to fund the massive list of infrastructure investment required within each Growth Corridor and PSP.

Council understands the issues and challenges of housing affordability and that this is the key justification for the rushed and opportunistic planning work currently being undertaken.

Council also understands that the issue of Housing Affordability is a complex one that is highly unlikely to be simply resolved by the approval of Corridor Plans and PSPs. Council considers that existing and future communities are being asked to pay too high a price for such an unsophisticated response to housing affordability.

Neither the Corridor Plans nor the PSPs contain any discussion of the approach to social housing, the management of tenure or even require the timely release of land by those developers that will directly benefit from the accelerated approval process.

Council considers the resources of the GAA could be much better spent addressing these matters in favour of the current one dimensional obsession with accelerating the approval process which adds another level of bureaucracy to the planning process and provides no guarantee that the cost of a house in growth areas will be any cheaper, but will almost certainly guarantee they will be more expensive to live in.

2.4 Impacts on Council

The current program of Corridor and PSPs is yet another GAA led process which has no regard to the impacts both the timing and outcomes will have on Council. Council has recognised the importance of these documents and has committed significant resources to responding within the required timelines. However a true partnership approach would

respect the needs of Council to provide the community and its elected representatives time to understand and provide comment.

Not only does the current process and timelines for responding to the GCP and PSPs show little respect to Council's requirements, little regard has also been given to the impact the development of these new areas will have on the capacity of Council to manage the delivery of these areas into the future.

Again a true partnership would involve the GAA seeking to understand the needs of Council and work to accommodate Council's requirements with the recognition that these reflect local circumstances and the Council approach to the planning and management of the entire municipality not just the growth areas.

2.5 Inability for Council to consult with the community

The timelines for responding to the GCP and PSPs have prevented Council from being able to properly consult with the community. Council has undertaken considerable consultation with the Sunbury community as part of the Sunbury Hume Integrated Growth Area Plan (HIGAP) process which has helped Council refine the Plan and provided the assurance the outcomes proposed reflect community aspirations and expectations. Without a similar level of community input the GAA and State Government have no sense that what it is planning through this proposed PSP is consistent with community aspirations or needs.

It is also unclear whether all relevant information will be given to the affected landowners and affected parties. It is understood that the GAA are not intending to inform all of the affected parties that it is proposing to assess this amendment as a 20 Part 4 amendment. The community should be made aware of their rights, and it should be stated in the information given to affected parties that it is the State Government's intention to assess this amendment as a 20 Part 4 amendment.

3. LOCKERBIE PRECINCT STRUCTURE PLAN COMMENTS

In its current form:

- The Lockerbie PSP has an area of 1,122 hectares, and falls over three municipalities – Hume, Whittlesea and Mitchell. Approximately 54% of the developable land of the PSP is within Hume with 36% in Mitchell and 10% in Whittlesea.
- The Lockerbie PSP identifies that it will yield approximately 10,600 lots including 2,000+ lots less than 300 square metres.
- Based on an average household size of 2.8 persons used by the GAA for their projections (Victoria in Future 2008), the future population of the Lockerbie PSP is estimated to be approximately 31,100 people. (Although using Council projections, this population could be higher, approximately 33,000 people).

- Stockland control around 73% of the developable area with the balance split between National Pacific (7%) and smaller independent land holders (20%)

3.1 PSP Issues

3.1.1 KALKALLO TOWNSHIP

Kalkallo is a township which has an old and inappropriate subdivision layout, no reticulated services and only a handful of local retail and commercial services. It also has excellent biodiversity values and a number of areas are managed by DSE. Current planning policy attempts to control lot sizes and provide a more appropriate road and urban structure but a comprehensive approach to the township's planning is required. The planning of the Lockerbie PSP provides the opportunity to resolve a number of these issues and provide a more certain and comprehensive planning response for the township.

Despite the positive wording in the GCPs, the Lockerbie PSP provides an inappropriate response to the Kalkallo Township.

To address this Council request that the GCPs be revised to require that the following outcomes be enabled through the preparation of the PSPs:

- Ensuring that the township is appropriately connected to reticulated services;
- Confirmation of the future land uses in Kalkallo, including the existing and potential retail and commercial facilities;
- Retaining and enabling appropriate access onto the major road network, notably the Hume Freeway and Donnybrook Road;
- Providing connectivity and permeability through new neighbourhoods to local and regional facilities; and
- Identifying and enabling appropriate treatments and interfaces with the Kalkallo Creek and the Kalkallo Common which both contain important biodiversity.

3.1.2 NATIVE VEGETATION AND BIODIVERSITY:

The proposed Plan does not meet the requirements of Victoria's Native Vegetation Framework or the Strategic Impact Assessment Agreement. The following must be addressed:

- The Biodiversity Assessment Report (SMEC, 2010) is inadequate. Areas classified as Plains Grassy Woodland are in fact Plains Grassland. This is a significant error in the report and must be rectified.
- The quantity of vegetation shown as retained does not meet the objectives of the Victoria's Native Vegetation Framework. The Plan does not show that the

removal of vegetation has been avoided or minimised. Greater portion of the vegetation on the site must be retained.

- Grasslands classified as Natural Temperate Grassland of the Victorian Volcanic Plain are not shown as retained. Patches adjacent to the creek are in fact shown as removed and replaced with ponds for the Growling Grass Frog. The infrastructure must be placed elsewhere and these patches must be protected.
- Much of the vegetation classified as Stony Knoll Shrubland could potentially be classified as Natural Temperate Grassland of the Victorian Volcanic Plain, despite the assessment made on the Biodiversity Assessment Report (SMEC, 2010). These areas must be retained.
- A connection between the buffer and Kalkallo Commons should be created.
- Areas shown as unencumbered passive open space are present along the creek where significant vegetation exists. These areas are encumbered and cannot be considered passive open space.
- Council note that the 200m buffer for growling grass frog along the Merri Creek is to be reduced to 50m through the proposed Donnybrook town centre, principally to reduce the sense of separation from the town centre and the train station. Council recognises the need for this good connectivity but considers that further work is required before the scale of reduction can be supported. Specifically, Council object to any reduction until further work is undertaken to determine the required land take for all of the following:
 1. flooding, erosion and water treatment
 2. passive open space, and walking and cycling connectivity
 3. roads and bridges; and
 4. appropriate habitat protection

Another significant issue with the proposed Plan that impacts on biodiversity and native vegetation values which must be modified involves:

- The connector road north of the Kalkallo Township and the road north of the Kalkallo Cemetery, both encroach into the Kalkallo Common. The road alignments must be changed to allow for a two metre buffer along the reserve.

3.1.3 OPEN SPACE AND ACTIVE RECREATION:

- The Lockerbie PSP does not provide effectively for open space and recreation opportunities.
- All active recreation spaces are currently undersized (with the exception of the 16Ha district open space site that is constrained by the creek corridor). All district open spaces should be a minimum of 10.25Ha (excluding any indoor active recreation facility).

- It is assumed that the yellow square on the corner of the largest district park is supposed to be an indoor recreation facility. Can this be confirmed, and if so, please amend the Plan to differentiate this site from other community facilities. If not, an indoor recreation facility is required.
- Consideration should be given to the location of a youth facility. There also needs to be consideration given to youth focussed facilities such as BMX, Skate and senior play areas.
- Further investigation is also required in relation to the inclusion of an aquatic and fitness centre. This investigation should include consideration of the need and potential to locate these facilities in Lockerbie Town Centre.
- All neighbourhood parks should be 0.75Ha in size. Most appear to be 1Ha and this is too large. There should be more neighbourhood parks provided, at a size of 0.75Ha (all with a minimum length of 70m in any one direction).
- The neighbourhood park shown in close proximity to the southern active sport ground is too close. It should be moved further away, potentially to adjoin the boundary of the Kalkallo Township, so that it could act as a buffer between residential development and the Kalkallo Commons.
- The shared path and cycle network should be shown on the Plan.
- The use of 2.8 persons per household is not an accurate measure for this area. 3.1 persons per household should be used and this could alter the amount of facilities required.
- The ASR report did not include all the existing facilities in the area. Missed facilities include:
 1. Highgate Recreation Reserve – District site 10.25 ha
 2. Proposed infrastructure – Craigieburn Town Centre – athletics and 3 pitch soccer development.

3.1.4 COMMUNITY FACILITIES

- The Lockerbie PSP does not provide effectively for the provision of adequate community facilities to service the future communities identified.
- Current accessibility to the Craigieburn Township is extremely poor, with residents required to travel at least nine kilometres along a major freeway. Unless community infrastructure is provided in Lockerbie and Merrifield West at the commencement of each development, these communities will be geographically isolated from community support networks during early stages of development.
- Social isolation can lead to increased likelihood of depression, plus a greater likelihood of chronic illness such as heart disease, cancer and diabetes.

Alternatively, the support of others may reduce the harmful effects of stress, and the influence of others may encourage behaviour that contributes to good health. Positive relationships and connections help people to feel they belong and have a part to play in society. People who feel socially connected also contribute towards building communities and society.

- Developers must commit to the early provision of community infrastructure at the commencement of the development to ensure each local community has ready access to meeting and service delivery spaces. These spaces may initially be provided in temporary facilities co-located with each sale centre. As a minimum a small community meeting space to host community activities and a small office which can be used by visiting services such as Maternal and Child Health will be required.
- To alleviate some of these accessibility issues, it is also recommended that community transport be provided in Lockerbie and Merrifield West for the first five years to ten years of development whilst public transport establishes across the area. This would need to be a dedicated bus and be in place until the public transport services are operating. All cost associated with this should be covered through the preparation of this PSP.
- Given this level of isolation, it is also recommended a Community Development Worker be employed for a period of 5 years to promote strategic and responsive community development and planning within the community to enhance wellbeing and strengthen social cohesion. This will involve establishing and maintaining strong networks with a range of stakeholders in Lockerbie and Merrifield West who may have competing needs and developing and implementing programs to address and respond to these needs. It is estimated that the annual cost for a Community Development Officer would be in the vicinity of \$80 – 90,000 (including 25% on costs). An additional programming fund of approximately \$10,000 annually would also be needed to be available to support the development of a range of community initiatives and activities.
- The proposed development needs to provide temporary meeting and service delivery space at the commencement of development.
- The central community hub should be increased in size to 1.2Ha. This would then be able to accommodate a Community Arts Hub component.
- Hume City Council officers have not had an opportunity to discuss integrated planning across the development with Mitchell or Whittlesea Councils. Without this discussion, the impact is also likely to affect community outcomes.
- The first community hub in each PSP should act as a regional facility until a second facility is activated.
- There is little knowledge of the civic infrastructure proposed or required in the Lockerbie Town Centre, including higher order facilities.

- The relevance of using the existing Craigieburn population data as a reference is not considered appropriate.
- The use of 2.8 persons per household is not an accurate measure for this area. 3.1 persons per household should be used and this could alter the amount of facilities required.

3.1.5 DEVELOPMENT CONTRIBUTIONS PLAN

- Council has only very recently received an updated version of the proposed Lockerbie Development Contributions Plan (DCP). This updated version was forwarded to Council on Tuesday 20 December 2011, 3 days prior to the end of the consultation period. Council has not had an opportunity to comment on this DCP and will make further submissions on this documentation when it has had an opportunity to consider and analyse the updated DCP.
- The commentary that follows is in relation to the DCP circulated with the consultation documentation:
- Council has only recently received a Development Contributions Plan (DCP) for Lockerbie. Discussions have been held with the GAA and the other affected Councils to reach agreement on the form of a DCP which will extend over three municipalities, namely, Hume, Mitchell and Whittlesea.
- This is a new approach required because of the GAA's decision to cast the PSP in this way, presumably to involve all of Stockland's land and to achieve the desired lot target.
- The outcome of this discussion is that the GAA will now prepare a single DCP for the entire PSP area that will allocate a single Council as the agency responsible for collecting and delivering each infrastructure project. Projects that straddle municipal boundaries such as roads and bridges will require the affected Council's to liaise and agree on the standard of works required.
- Whilst this would seem a pragmatic solution to the problem, it invites a level of uncertainty to the actual cost of the infrastructure item and leaves Council as the development agency, exposed to cost escalations as standards are agreed between Councils and other agencies particularly VicRoads, who will become ultimately responsible for this infrastructure.
- As such, Council does not support the proposed DCP until the final cost and scope of all projects are determined and agreed to by all parties.
- The majority of items will be the responsibility of Hume (33 of 45 items) including the majority of contributions \$159m of the total \$224m recoverable by the DCP.
- It is also important to note that according to the DCP the Total Project Costs for the DCP are approximately \$260m, with \$224m recoverable by the DCP,

leaving a shortfall of \$36m that will need to be obtained from other sources. These DCP figures do not include infrastructure that will need to be delivered directly by the State Government to provide sufficient infrastructure and services to the PSP area.

3.1.6 TRAFFIC AND TRANSPORT

- The Lockerbie PSP does not respond effectively to the traffic and transport requirements of the PSP area.
- There are significant inconsistencies between the proposed Lockerbie PSP and the draft North Corridor Plan recently released by the State Government. An inconsistency of this type is extremely worrying to Council and needs to be remedied.
- The Engeny Report (Appendix A – Catchment Layout and Drainage Strategy) shows the north-south arterial road intersecting with Donnybrook Road adjacent to the Kalkallo Township. This is consistent with the draft North Corridor Plan. However, this does not match the Lockerbie Future Urban Structure Plan, which shows the two roads intersecting with what appears to be English Street.
- Council requires clarification in regards to the multiplying factor of 6.83 used to calculate the daily traffic volume from the 2-hour-peak volume as presented in the Memorandum from GTA dated 17 November 2011. Council is concerned that this calculation results in an over-estimation of 24% of the daily traffic volume and therefore in an over-estimation of the required number of traffic lanes. The shown AM peak hour traffic volume is only 8% of the daily traffic flow and not 10% as generally accepted.
- In regards to the "Transport Impact Assessment" presented by GTA, Council is concerned about the accuracy of the traffic volume data used in the report. The traffic distribution has been developed using the VITM model before the re-calibration of the VITM model done by GTA on behalf of GAA and called "Northern Growth Corridor MITM modelling: Calibration and Validation Assessment".
- GTA report states it is "based on broad generic assumptions". This is not adequate.
- GTA has acknowledged in the Transport Impact Assessment (page 18) that the results of the recalibration study should be considered before finalising the design of intersections. Council requires information about the differences in the proposed road network and distribution of traffic as a result of the recalibration process. Council will expect information about how this will be considered in the design of the final road cross sections.
- Council considers that the number of public transport, bicycle and pedestrian trips calculated using Vista2007 is underestimated. The amount of trips is based on current mode share conditions in Hume and do not considers the

benefits of the proposed footpaths, on-road bike lanes, shared paths and bus services in the PSP area.

- Further to the over-estimation of traffic volumes, Council would like clarification about why the Lockerbie Railway station has not been included in the transport/traffic study, as per comment in page 18 of the "Transport Impact Assessment".
- The traffic and transport response in the Lockerbie PSP also fails to take into consideration the drainage strategy for the Lockerbie PSP area. This is a fundamental issue and must be adequately addressed and has not been thus far.
- Council has concerns that there has not been adequate consideration regarding the data shown in the Drainage Strategy Plan and how the proposed arterial road would cross the Merri Creek.
- Information is required as to who will be constructing Lockerbie Train Station and when this will occur.
- Information is required as to who will be upgrading Donnybrook Train Station and when this will occur.
- Information is required as to when the train line to Lockerbie would be electrified.
- Has there been adequate consideration to the amount of carparking provided for the proposed train station, as well as the vehicular access to the train station?
- The PSP needs to show all shared paths and cycle routes.
- As the train line also carries freight, has there been any consideration given to the noise impacts this could have on the adjoining high density development near the station?
- Transport planning needs to consider the existing Kalkallo Township.
- Section 3.4 of GTA report states "minor pedestrian connections". Clarification is sought on what this means. Council require full pedestrian access along both sides of all streets unless exempt by Rescode.
- VicRoads need to confirm cross-section and budget for upgrade of Donnybrook Road east of Hume Freeway.
- The number of overpasses and bridges make the development very isolated, including overpasses over Hume Freeway, the rail line and Merri Creek.
- Council is concerned over the lack of certainty regarding who will be funding the enormous infrastructure upgrades and when this will occur.

- Given the number of crossings and the new rail station and an upgrade of new station, consideration should be given to lowering of the rail track through Lockerbie.

3.1.7 CULTURAL HERITAGE

- The Lockerbie PSP has not adequately considered the cultural heritage matters relevant to the PSP area.
- Council considers it necessary to have the Cultural Heritage Management Plan (CHMP) completed prior to the completion of the PSP, as the outcome of the CHMP could greatly impact on the planning of the area.
- The desktop assessment shows that there are a number of Aboriginal Cultural Heritage Places within the study area, as well as historical sites. The location of these on the maps in the report indicates that no consideration has been given to these in the planning of the PSP. The historical sites should be taken into consideration when planning the PSP, or justification should be provided as to why they are not being properly considered.
- The report states that a CHMP is required for the site. Council considers it necessary to have the CHMP completed prior to the completion of the PSP, as the outcome of the CHMP could greatly impact on the planning of the area.

3.1.8 CONTAMINATED LAND

- The Lockerbie PSP has not adequately considered whether any of the PSP land is contaminated.
- The Lane Piper Phase 1 Environmental Site Assessment report makes several recommendations for further work to be completed, given that there are a number of sites of potential contamination in the assessed area. Confirmation is required as to whether a Phase 2 assessment is being undertaken prior to completion of the PSP, particularly as it relates to the two Section 96A applications that have been submitted for land covered by the Phase 1 report.
- This report only appears to relate to Stockland's and National Pacific land parcels. Given the number of sites of potential contamination found in that area, it is considered essential that an Environmental Site Assessment be undertaken for the remaining land parcels prior to this PSP progressing further.

3.1.9 DRAINAGE AND SERVICES

- The Lockerbie PSP has not adequately considered drainage and services requirements for the PSP area.
- No servicing report has been received. It is extremely important that Council receive information on how servicing to this area is occurring, particularly in relation to sewerage. The GAA needs to advise Council when these reports will be received.
- There needs to be a 35m buffer outside the 1 in 100 year flood level for all creeks and drainage reserves.

3.1.10 LOCKERBIE TOWN CENTRE

- The timeframes to approve this PSP are extremely short, and the proper planning of such a large area as well as a Principle Town Centre simply cannot occur in these timeframes. The Lockerbie Town Centre should not be included in the PSP, so that it can be dealt with at a later stage and fully considered. Failure to do this will result in opportunities to plan effectively for this significant centre being lost.
- Council has considerable concern regarding the GAA's indication that the Principle Town Centre Masterplan and Framework Plan will be approved as part of the PSP. Council notes that the GAA has proposed that further Urban Design Precinct Plans will be required and approved by Council prior to permits being issued for future works within the Lockerbie Town Centre. However, the requirements for the proposed Urban Design Precinct Plans and more significantly their relationship to the Masterplan and Framework Plan intended for approval within the PSP are unclear.
- If the GAA choose to include the Lockerbie Town Centre in the approval of this PSP, it would be preferred that it was in a scaled back format similar to other PSP's already approved in Hume. Additionally, there should at minimum, be a requirement within the PSP that an Urban Design Framework or similar be submitted and approved prior to any permits being issued for any area within the Lockerbie Town Centre. Such a process would enable all of the issues facing an activity centre of this magnitude to be fully considered by all parties with an interest in its planning and development.

3.1.11 LANDSCAPE PLANNING

P4 Plan 2- Lockerbie Precinct Structure Plan- General PSP design comments

- High density is shown adjacent to the Merri Creek in the proposed Lockerbie Principal Town Centre precinct. The extent of this high level of residential development is not in accordance with the planning principles of the ESO. The narrowing of the creek corridor in this vicinity is likely to compromise the Ecological Function Objectives as outlined in the ESO. Increased density will

result in a higher level of disturbance and ecological degradation (from access, rubbish and weed infestation) than conventional residential development. Construction of high density residential development within an ESO is in direct conflict with the ESO2 Decision Guidelines, in that the height and bulk will compromise the visual character of the creek corridor.

- The Active Open Space within the Lockerbie Principal Town Centre precinct includes a significant area of land encumbered by the 1:100 year flood zone and ESO2.
- The Plan shows 2 Connector Streets within the Kalkallo Common title boundaries. Construction of these roads would compromise the ecological values and primary function of the common.
- The Neighbourhood Open Space reserve shown in the south west of the site is shown as encumbered for stormwater retention and treatment purposes in the Drainage Strategy.
- No reserve has been included in the western boundary of the PSP, adjacent to the existing Kalkallo Township, to accommodate the retarding basin and wetland facilities proposed in the Drainage Strategy.
- The Neighbourhood Passive Open Space is not equitably distributed across the site, and the open space catchments do not adequately provide for all lots to access open space within 400-500 walkable metres (see comments on Plan 5 below). All passive open space reserves are to be reduced in area to Council's minimum requirement of 7,500m², and the remaining passive open space area is to be redistributed to allow access within 400-500m of all lots, in accordance with Council's Development Principles.

P7 2.3 Summary Land Budget

- The intention to produce a lot yield of over 2,000 lots of less than 300m² in the PSP will result in a high degree of pressure on open space reserves. Additional passive open space developed with a high provision of facilities should be articulated in the PSP.

P11 3.1 Image, Character and Housing

- R1 amend to read *"Development along the Merri Creek must be separated from the creek reserve by a road and must address the open space."*
- R7 is a repeat of R3.

P12 Plan 5 Open Space, Natural Systems & Community Facilities

- There are several residential pockets that are not covered by the 400-500m walkable open space catchments: Two along the northern boundary, one north of Gunns Gully Road extension on the Hume Freeway, a small pocket either side of the central Arterial Road south of the Lockerbie Principal Town Centre, and one on the eastern side of the central Arterial Road along the

southern boundary of the site. In addition, no consideration of the lack of passive open space within the existing Kalkallo Township has been taken into account. All passive open space reserves are to be reduced in area to Council's minimum requirement of 7,500m², and the remaining passive open space area is to be redistributed to allow access within 400-500m of all lots, in accordance with Council's Development Principles. This re-distribution is to provide for Neighbourhood Passive Open Space in close proximity to the existing Kalkallo Township.

- The Plan is to be amended to clearly show reserve areas set aside for conservation purposes distinctively from general passive open space areas.
- The 100m buffer along the Merri Creek, recommended in the SMEC report to protect environmental values, has not been evenly applied along the creek's length. Of particular concern is the area included within the Active Open Space and High Density residential area within the Principal Town Centre.
- Part of the Active Open Space in the Principal Town Centre is encumbered by the 1:100 year flood zone. This contravenes Council's Development Principles.
- The 3 most southern Neighbourhood Passive Open Space reserves are located in places identified on the Drainage Strategy for wetlands, retarding basins and treatment swales. If this is the proposed function, the reserves should be clearly shown as Encumbered Open Space. There are many discrepancies between the Future Urban Structure Plan and the Drainage Strategy Plan that require clarification prior to endorsement of the PSP.

P13 3.2 Open Space, Natural Systems and Community Facilities

- R13 Amend to read *"All open space reserves are to have road frontages on a minimum of 2 sides. The Merri Creek corridor is to have road frontage along it's entire length"*, in accordance with Council's Guidelines for the Planning, Design and Construction of Open Space in order to maximise surveillance.
- Amend R17 2nd dot point to include *"open space is to be regular in form with an minimum width of 70 metres in any one direction"*, in accordance with the Council's Open Space Strategy and Development Principles.
- G22 Add *"in accordance with Plan 5."* (Plan 5 is to be amended to clearly define conservation reserves as separate from open space areas as noted above).
- G24 Amend to *"Provide pedestrian and cyclist crossings of the creek and drainage corridors at a minimum of every 200m, to improve accessibility and permeability within the precinct"*.
- G26 is a repeat of G19.

- G27 is a repeat of G20.
- R27 (and G31) Biodiversity and Natural Systems- Refers to the Merri Creek Conservation Management Plan for Growling Grass Frog, but there is no mechanism within the PSP for this to be prepared or approved. Plan 6 Threatened Species Action Plan is included in the PSP with no text explaining its purpose or how it is to be implemented. The preservation of Growling Grass Frog habitat is in direct conflict with the land uses shown on Plan 2, eg the required buffers to residential development are not provided in the vicinity Principal Town Centre.
- G30 - There is no mechanism within the PSP to provide the significant improvements to habitat and connectivity within and adjacent to the precinct, as noted in this Guideline. Although the biodiversity importance of the Merri and Malcolm Creeks, Stony Knolls and Kalkallo Common are noted in the NVPP, no provision for connectivity between these habitat zones has been provided in the Structure Plan.
- G32 - The assumption that open space adjacent to conservation reserves can be used to act as a buffer to assist in protecting environmental values is flawed. Land to be used as buffers for this specific purpose is to be in addition to the provision of open space, ie greater than the 7,500m2 minimum reserve size, or included within the boundaries of the conservation reserve itself.
- R28 - Passive Open Space Contributions, I note that where provision of unencumbered open space exceeds 2.38% of NDA, Council is to pay the owner of the property for the difference in value. Council would expect this offset to have been taken into account in the DCP.
- G41 - Heritage - The Terra Culture Cultural Heritage Report identifies the PSP as an area of cultural heritage sensitivity, and identifies 12 registered Aboriginal Cultural Heritage Places. No attempt to protect any of these sites has been made in the design of the PSP, and no reference for the need to prepare CHMPs as part of the Planning Permit application has been made. G41 refers to only one of the non-Aboriginal heritage sites identified in the Terra Culture report. Additional requirements to preserve non-Aboriginal heritage sites should be articulated in this section of the PSP.

P19 Principal Town Centre Concept

- The 'pockets' of open space proposed along the narrowed creek corridor will not be able to be substantially developed as usable open space as they are within this buffer zone.
- The proposed increased density within close proximity to the creek will increase pressure on the conservation values of the corridor from pedestrian access and disturbance, wind blown rubbish and weed infestations.

- The retarding basin and wetland shown on the drainage Strategy are not shown on the concept.

P22 Open Space (Principal Town Centre)

- **Drainage Corridor** - The specifics of the Drainage Strategy are not included, and the implications of locating drainage facilities in this location are not taken into account in the concept design, *ie* constructing a retarding basin and wetland within a narrowed corridor.
- **Nodal Park** - This has been located within the creek buffer 'exclusion zone'. This is not a suitable location for a regional playground, as drawing people from a regional catchment will increase pressure on carparking and environmental values. A better location for a regional playground would be the Active Open Space south of the town centre, where parking, toilets and picnic facilities would be shared. P 30 refers to this location also being used for 'large outdoor community celebration and festivals'. There is insufficient space to provide for this function, and it is not appropriate given the environmental values of the site.
- **Active Open Space** - A large portion of the creek frontage is within the flood zone and is located within the buffer 'exclusion zone'. Indicate as encumbered open space as outlined above.

P47 3.5 Transport, Water and Utilities

Add the following points:

- Shared paths of a minimum 2.5m width are to be provided along both sides of all arterial roads.
- Shared paths of a minimum 2.5m width are to be provided along one side of all connector roads that are shown as potential bus routes.

P49 Cross-sections

- Include cross-section for connectors that are bus routes, showing 2.5m shared path on one side of the road as above.
- Delete all ground level planting on both cross-sections, and all references to ground level planting in text, as approval of landscape design will be subject to detailed engineering and maintenance staff OH&S requirements.

P50 Plan 9 Public Transport and Walking Trails

- Amend Plan graphics to clearly distinguish between all legend components for ease of reference during implementation.
- Amend Plan to show shared paths along both sides of all arterial roads, including Donnybrook Road.

- Amend Plan to show shared paths along one side of all connector roads that are shown as potential bus routes.
- Extend the shared path within the Bald Hill open space to the east, to totally ring the base of the hill.
- Extend the shared path network to the western sections of the Merri Creek reserve on the northern side of Donnybrook Road.
- Extend the shared path along the Key Local Access Road and connector roads into the existing Kalkallo Township, to provide good pedestrian and cyclist integration with the PSP area.

P52 & P53 3.6 Infrastructure Table

- The Timing column is inaccurate as it references works to be undertaken in 2010.
- G61 - It's noted that the onus is on the Responsible Authority to negotiate the value of land where Passive Open Space exceeds 2.38% NDA. These matters should not be left for negotiation and should be resolved prior to the PSP being endorsed.

