

[REDACTED]

19 February 2018

Department of Environment, Land, Water and Planning

Dear Sir/Madam

Re: Macedon Ranges Draft Localised Planning Statement

This submission is made on behalf of [REDACTED] who have interest in a [REDACTED] property [REDACTED]. The submission is made with the support of the landowner, [REDACTED].

We acknowledge the importance of reviewing the draft Localised Planning Statement and thank the Department for the opportunity to provide feedback.

It is recognized that the Macedon Ranges is a unique peri urban environment adjoining metropolitan Melbourne and we note and acknowledge past and recent planning policy that has enshrined this uniqueness in planning controls. We acknowledge and note, most recently, the Settlement Strategy 2011, implemented via Planning Scheme Amendment C84 to the Macedon Ranges Planning Scheme (approved in September 2015) which has ultimately supported the management of local growth to identified Settlements in achieving Council's desired outcome for settlement planning.

Broadly speaking, the Settlement Strategy is an overarching document that provides a framework plan for settlement planning and growth, largely underpinned by existing planning policy (outline development plans or structure plans) and is essentially in many ways a 'local growth management tool' that should be read in conjunction with existing State and Local policy and policy which ultimately ensures that there is a clear growth direction.

In regard to Romsey, the draft Localised Planning Statement makes it clear that the planning scheme forecasts Romsey (currently a district town) will be a large district town however framework plans for Romsey have not been included in the draft localised planning statement.

While it is noted long-term settlement boundaries will be determined Romsey as part of the review of the Romsey Structure Plan that form part of clause 21.13 – Local Areas and Small Settlements of the Macedon Ranges Planning Scheme and in the interim, the current plans will provide sufficient direction to guide strategic planning until these reviews are completed and settlement boundaries are determined in the next 18 months, we submit that these reviews should be undertaken without delay and should in fact be included in the Draft Localised Planning Statement.

Reviews and investigations need to be undertaken without delay. In relation to Romsey:

- Romsey's population is expected to almost double over the next 30 years
 - Council's Settlement Strategy identifies Romsey as increasing its function from a District Town to a Large District Town (6,000 – 10,000) by 2036
 - Significant employment opportunities are provided north of Melbourne's CBD in and around Melbourne Airport, and the logistics and freight developments in Melbourne's north
 - Road upgrades to the Melbourne-Lancefield Road and other arterial road improvements are making the town more attractive to commuters
 - Development of the Urban Growth Zoned land in Sunbury see more residential development and development of activity centres north of Sunbury Road and along the Melbourne-Lancefield Road
 - This can be expected to support demand for residential opportunities in Romsey.
- [REDACTED]

Review of the 2009 Romsey Outline Development Plan was to occur as part of the Settlement Strategy Development. This did not happen. Council's 2017-18 budget has allocated some funding, and it is indicated that a brief is being prepared for a consultant to prepare an issues and opportunities paper. On Page 23 of the Localised Planning Statement there is comment about settlement boundaries for Gisborne and Romsey, and review of the Gisborne / New Gisborne Framework Plan and Romsey Structure Plan that form part of Clause 21.13.

While it is indicated that settlement boundaries will be determined in the next 18 months, it is not clear whether the full review of the Framework Plan and the Structure Plan will be undertaken in this timeframe. A comprehensive review should be undertaken, and further delay and uncertainty in relation to the planning of these townships avoided. The rigorous and holistic planning advocated for these townships in the Localised Planning Statement needs to be undertaken now and be included in any draft localised planning statement. This will enable growth to be provided for, and opportunities realised for integration with the existing township and provision of community facilities.

In relation to *Objective 6*, we largely support the Policy domains and Framework plans included in the draft Localised Planning Statement in regards to Romsey, however submit the some re-wording is sought in relation to the 'Settlements' section under Objective 5. This section outlines the projected hierarchy of settlements in 2036 and notes that 'For townships that are forecast to grow and change in role and function, a long-term settlement boundary will be designated to manage growth'. A settlement boundary definition is provided, with it stated that any change to a settlement boundary requires a rigorous structure planning process, a planning scheme amendment and parliamentary ratification.

The section then continues:

'Areas identified in the Macedon Ranges Planning Scheme for future investigation or proposed medium to long term growth require detailed planning assessment to determine how the land can be developed, serviced and integrated with the established township. Any proposed development in these areas must be in accordance with the direction and objectives of the approved structure plan and have regard to how important environmental and cultural heritage features will be protected and enhanced.'

'The assessment will determine what land in the investigation area is suitable for urban purposes. It is not anticipated that all land contained within these investigation areas will be suitable for housing, given potential site and servicing constraints. An urban purpose is a use or development permissible under the planning scheme that supports the role and function of a township. It typically includes uses such as residential, commercial, industrial, parks, recreation, conservation areas, utilities and community infrastructure.'

'A planning authority will not consider rezoning an area identified for future investigation until a comprehensive level of planning and infrastructure assessment has been undertaken. A housing supply and demand assessment must be undertaken to demonstrate the need for growth. The investigation work will determine how these areas can be planned for housing, community facilities, transport, environmental conservation, draining and passive and active open spaces'.

Romsey (and Gisborne) do not have investigation areas shown, creating some uncertainty about the application of this section of the Localised Planning Statement and consideration of growth of these towns beyond current township boundaries. In the case of Romsey consideration of growth in areas outside the current township boundary has been indicated and is supported by the current planning policy framework however this does not allow for the projected expansion of the township.

Objective 4 of Clause 21.13-4 seeks:

'To provide for a greater mix of housing densities and styles as the town grows, in order to respond to changing demographics and ensure that land is developed efficiently, while respecting the valued character of the town'.

A related strategy (Strategy 1.7) is to:

'Protect areas to the immediate south and east of the town from encroachment by rural residential development, in order to safeguard the possibility of future urban expansion'.

In relation to the recent review of land in the Rural Living Zone (Macedon Ranges Shire Council 2015 *In the Rural Living Zone – Strategic Directions*, Macedon Ranges Shire, Gisborne) further opportunity for rural living subdivision was not considered within 2 kilometres of the town centre to retain urban growth options.

6.4.2. Managing Future Township Growth

The larger townships in the Macedon Ranges Shire have structure plans providing clarity about direction for urban growth over the next 15 years or more. Planning for township growth beyond this 15 year timeframe has not been undertaken and it is essential to maintain potential growth options for the long term. In some areas, such as Romsey, Gisborne and Riddells Creek; Rural living zoned land directly abuts town boundaries, where existing urban infrastructure and services are located. These growth fronts are the natural location for accommodating potential long term town expansion options.

However, township expansion is made extremely difficult where subdivision and development patterns have fragmented the ownership of adjoining land into smaller holdings with substantial homes. In this situation urban redevelopment is dependent on the cooperation of a number of landowners with mixed attitudes and expectations and staging of any development in these areas is likely to be sporadic and unpredictable. The application of appropriate zoning controls combined with large minimum lot sizes can preserve areas of potential long term growth on the fringes of townships so that urban style development can be easily accommodated in the future.

Key implications/recommendations:

- Existing large lots on the edges of urban centres should not be further subdivided in order to maintain options for future urban growth.

A minimum lot size of 40 hectares has been maintained in areas of the Rural Living Zone to avoid further fragmentation and allow for future growth of the township.

Through these objectives, through strategies within the local planning policy framework, and through referencing strategic work relating to Romsey, opportunities are being maintained for growth of the township in line with the Settlement Strategy. These areas extend beyond the town boundary shown in Clause 21.13-4 and are not clearly identified as investigation areas. The Localised Planning Statement needs to clearly acknowledge investigation of areas such as this where change in the role of a township is to occur.

In conclusion it is submitted that adequate resources should be provided for full review of the Romsey Structure Plan to proceed without delay and be included in the draft Localised Planning Statement. This should extend to implementation of structure plans with the necessary planning scheme amendments and parliamentary ratification as proposed in the Localised Planning Statement.

We welcome any opportunity to further discuss this submission with the Department and Macedon Ranges Shire Council.

Yours sincerely

[Redacted signature]

[Redacted name]

[Redacted title]

[Redacted contact information]