

## Submission

28 March, 2013

### Metropolitan Planning Strategy

Discussion Paper "Melbourne, let's talk about the future", October 2012.

# 1 Introduction & Background

## 1.1 Macedon Ranges Residents' Association Inc

Macedon Ranges Residents' Association Inc [MRRA] is a voluntary community group, established in 1995. The Association has a long history of active interest and participation in government/governance, environmental and planning matters at local and State level (see Association Purposes at Attachment 1). Contact details are at page 12.

## 1.2 About Macedon Ranges Shire

Macedon Ranges Shire is a rural shire, immediately outside and abutting metropolitan Melbourne. The Shire falls within the "peri-urban" area shown at Map 1 (page 3) in the Discussion Paper, as well as the "hinterland" area described in Clause 11.05-2 of the State Planning Policy Framework [SPPF].

Macedon Ranges and environs is an area long-recognized as having significant environmental sensitivity, and important natural resources including high conservation and geological values, and open potable water catchments supplying drinking water to Bendigo, rural/local towns and parts of metropolitan Melbourne. Macedon Ranges is specifically identified as requiring particular protection at Clause 12.04-1, *Environmentally sensitive areas*, in the SPPF. However, as a rural Shire, Macedon Ranges is not included in the metropolitan "Green Wedge" legislation.

The Shire has historically and is currently experiencing substantial urban and other development pressures, mostly from metropolitan Melbourne. Conservation of the Shire's environment, landscapes and natural resources, and their significant contributory role to Melbourne's amenity and wellbeing, requires these pressures to continue to be resisted.

Introduced as State policy under the Town and Country Planning Act 1971, *Statement of Planning Policy No. 8 (Macedon Ranges and Surrounds 1975)* [SPP8] recognizes the area's State level environmental significance. That Act's basis for Statements of Planning Policy was not transferred to the Planning and Environment Act in 1987, leaving the Statements without a legislative basis. Although no longer State policy, over time various Panels have confirmed the continuing relevance of SPP8 to Macedon Ranges Shire. The Policy is currently expressed as Clause 22.01 in the Macedon Ranges planning scheme, and begins:

*"The policy is directed primarily to the planning and management necessary for the conservation and utilisation of the policy area both as a water catchment for urban and local supply and as a location of State, metropolitan and local importance for leisure activities and nature conservation."*

*It is policy that: "Protection and utilisation of the resources of the policy area for water supply, tourism and recreation, and nature conservation must be the primary concern."*

In February 2013, the Coalition State government announced it is preparing a “Localised Planning Statement” (i.e. State policy) to protect Macedon Ranges (and three environmentally sensitive areas in the metropolitan area).

The State government also has a policy commitment to retain Statement of Planning Policy No. 8. The Association has long campaigned for re-instatement of this policy as State policy to protect environmental and natural resources in Macedon Ranges, and the government will be held to its commitment.

### **1.3 Why Comment On The Metropolitan Planning Strategy?**

The Discussion Paper makes it clear that the Metropolitan Planning Strategy is about more than Melbourne. Its reach extends well beyond the metropolitan area, impacting regional cities, rural areas and environmentally sensitive areas including Macedon Ranges Shire.

Macedon Ranges Shire is also affected by the as-yet-unseen Loddon Mallee South Regional Growth Plan, and the imminent Localised Planning Statement (details of which have not yet been made public). This situation creates confusion and uncertainty, and potential for conflicting objectives arising from three different strategies and policy. It is not clear how priorities for environmental protection will be implemented.

We hold major concerns with the potential impacts a Metropolitan Strategy may have in Macedon Ranges Shire. The Strategy’s predecessor, Melbourne 2030, placed parts of the Shire within the Bendigo regional transport corridor, and applied policy relevant to protecting water catchments, small towns, rural land and the environment.

However, the corridor plan required by M2030 was never exhibited, leaving the corridor without clear direction or protection for Macedon Ranges. The requirement for M2030 to be considered in decisions in municipalities abutting the metropolitan area in practice became ‘apply M2030 as for the metro area’, while policy for protecting rural land and the environment languished. ‘Transport’ corridor became ‘growth’ corridor, and metropolitan elements of M2030 – e.g. *urban* settlement policy, *metro* ResCode standards – triumphed, with devastating effect.

Our fear is that a new Metropolitan Strategy will produce equally unacceptable outcomes and damaging effects.

Additional concerns arise with the Discussion Paper’s replication of and support for changes proposed in draft State zones exhibited in 2012 to Farming, Rural Conservation and Rural Living<sup>1</sup> Zones (the main rural zones applied in Macedon Ranges). In the Association’s view, the exhibited changes would be very damaging to the environmental significance and integrity of Macedon Ranges, and through similar changes in Green Wedge zones, to Green Wedges abutting the Shire’s southern boundary.

## **2 Consultation**

The State government has undertaken and sponsored a note-worthy consultation process to obtain wide-spread community input on the Discussion Paper, and is applauded for this.

However, there is a difference between consulting, and *listening to*, community voices. The Association is alarmed that consultation before the Discussion Paper’s production included many business and development interests - but no community groups - and that the Discussion Paper’s content unmistakably reflects those interests.

Commendable consultation processes may offer the *opportunity* to comment, but we are not confident sufficient weight will be given to community views to introduce some balance to the economics bias evident in the Discussion Paper.

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<sup>1</sup> RLZ1 Minimum 40ha subdivision size

### 3 Comments On The Discussion Paper

The Discussion Paper doesn't explain itself well, and is a difficult read. It is at times repetitious; uses too much 'industry' jargon; lacks clarity and precision, particularly when addressing rural and environmental issues; and contains conflicting objectives which aren't reconciled. While some of the 'vision' is crystal clear, there are many areas where it is too vague and ambiguous to be readily understood.

Statements which might raise hope of improvement over the existing situation are overwhelmed by the document's dominant economic priorities and 'end justifies the means' philosophy. The Association believes proposals to:

- *make 'fast-tracking' process changes*
- *provide precedent-setting privileges for private interests*
- *remove regulation*
- *abandon 'protective' and 'defensive' management of natural resources, and*
- *promote strategically unjustified and unsustainable expansion of development opportunities*

increase uncertainty; erode natural justice, transparency and accountability; undermine strategic planning and land use principles; fail to meet sustainability tests; and create conditions that are ripe for corruption to flourish.

**The Association does not support these proposed changes, and consequently cannot support the Discussion Paper at this time.**

#### 3.1 The Discussion Paper Is An Economics Strategy Not A Land Use Strategy

While claiming, at page 1, that the Metropolitan Strategy will be a planning, development and transport strategy, and is not directed at specific areas of the economy, the environment or community health, the unmistakable priority and driver of the Strategy is economics. Even social issues are addressed in terms of economics, while the environment and environmentally sensitive areas appear to be viewed to an alarming degree in terms of their ability to provide an economic return. *There is no obvious recognition or balancing of sustainability principles in this document.*

The Discussion Paper reads as a business plan – an economics and development strategy – with a clear intention to remove 'obstacles' to economic development and create, for some, windfall gain. Those 'obstacles' appear to be the principles of fair, proper, orderly and particularly strategic land use planning, and community rights to know and object to proposals that adversely affect people and their surrounds.

These are apparently to be abandoned by removing regulation, allowing development proposals to over-ride planning schemes, fast-tracking and allowing development where it is currently not allowed – all in the interest of growth, development, economic projects, and that oft-used word, "productivity".

We note that at page 21, *Housing*, comment is made that "*Reducing development delays and examining innovative development forms could reduce the costs of construction*". It seems nothing except being able to do what you want, when you want, where you want and how you want will satisfy some sectors. Delays are often self-inflicted, caused by incomplete or substandard applications, and proposals commonly maximise profit rather than quality, or are square pegs 'innovatively' being rammed into round holes.

We further note that "*nett community benefit*" (page 10) will be applied, but what is it, and who decides? The Discussion Paper unashamedly addresses social issues in economic terms – jobs, houses, productivity, etc etc. Where is discussion of social issues in terms of social justice, and lack of it when the places and things people value are swept away by development proposals? With this imbalance in thinking, it seems net community *benefit* will be confined to economic benefits – jobs, houses, productivity, etc etc – gained at the expense of people, their values and the environment.

The Association doesn't look at social issues in economic terms; it looks at social issues in people terms. We get many calls from people who feel utterly disempowered by *existing* processes and developments that threaten their homes, interests, values or places – indeed, their very enjoyment of life.

The Association's experience is that people are comprehensively over the "jobs, jobs, jobs" mantra used to justify outrageously damaging economic development; being told destruction of what they value *benefits* them; and being called 'nimbys' by those who destroy for profit.

The Association told a Parliamentary Inquiry in 2005 that we wished we had a dollar for every time we listened to community tears and anger. The Discussion Paper doesn't recognise that distress or that anger, or the depth of the sense of disempowerment and injustice that consumes people when their values and rights are dismissed and denigrated. It also doesn't recognize the debilitating effects of this on wellbeing and (dare we say it) productivity, or that development (including infrastructure projects) can be so repugnant it forces people from their homes. The Discussion Paper instead digs a deeper hole by advocating more disempowerment. This is *not* acceptable.

### **3.2 On-Going Over-Population Underpins Discussion Paper**

The Discussion Paper notes critical problems produced by recent rapid and substantial population growth (e.g. over-crowding, congestion and burgeoning infrastructure deficiencies). Yet it does not question the State's capacity to carry additional population, or assess what stands to be lost or irreversibly damaged by it, or measure the sustainability of continued galloping population growth. The Discussion Paper instead accepts that growth as a fact, and focuses on putting it somewhere (anywhere) - indeed, it promotes *accelerated growth* in regional and rural areas - while telling Victorians **we** must change our thinking, **we** must change how we live and do things, to make it all work!

Nowhere are the limits to growth recognized, or that there are major social, environmental and servicing penalties for not critically evaluating population growth, and the State's finite capacity for it, **now**.

Victoria is the second smallest State in Australia. It occupies only 3% of the land, but already contains 25% of the nation's population. **This produces a population density of 25.54 persons per square kilometre, almost 3 times the density in New South Wales (9.05), almost 4 times that in Tasmania (7.48) and more than 15 times that in South Australia (1.67).**

Victoria may already have the dubious honour of being the "Black Hole" state of Australia, and increasingly the place *not* to be. The Discussion Paper seems intent on squeezing people into every existing and newly created space, including "vertical villages" (like putting more people on an already overcrowded train), with occasional fruit-tree-filled green patches (thereby enhancing amenity with the perfume of rotting fruit).

Without a huge reality check, rather than a State of cities, Victoria runs the risk of becoming a *City State* (e.g. urban sprawl reaches Swan Hill). Even as existing over-population continues to elevate public concern, and the ability to pay for and deliver infrastructure urgently needed for the *existing* population moves further and further out of reach, there still is no public debate on population growth. That debate is essential, and long overdue.

The Discussion Paper recognizes that stunning amounts of money are required for new infrastructure – construction if not ownership of much is apparently to be placed in the hands of private investors, which in itself raises concerns. What doesn't seem to be taken into account is that the magnitude of existing deficiencies is so great, Victoria will struggle to meet even existing requirements. The level of growth envisioned in the Discussion Paper will inevitably feed demand for more and more infrastructure and services, outpacing the ability to provide. Victoria may never catch up. How can a Metropolitan Strategy which fails to look this squarely in the eye, along with increasing public alarm at over-population, have credibility?

### **3.3 Justification for Exhibited State Zone Changes**

The Discussion Paper breathes life into the dreadful, non-strategic changes proposed in the draft State Zones exhibited in 2012. Thousands of people, through their councils and groups, said 'no' to those changes which, other than the Neighbourhood Residential Zone, appear so divorced from strategic planning principles they might have been arrived at over a red/chardonnay on a rainy Sunday afternoon.

Yet the Discussion Paper promotes the same ideas: the same ‘everything everywhere’, the same removal of existing controls, the same economics-first philosophy. The next step would appear to be inclusion of “strategies” (derived from the Discussion Paper, of course) in the Metropolitan Strategy in an attempt to “justify” those strategically unjustifiable zone changes. They aren’t about land use planning, and any Strategy promoting them won’t be either.

### **3.4 Less Not More Certainty**

In the Association’s view, the Discussion Paper sets a scenario that creates less, not more, certainty. There is no obvious improved natural justice or equity in what is being proposed and, frankly, there is a patronizing air to assumptions of what ticks the ‘social’ boxes.

Public confidence in the Victorian planning system is at rock bottom. Between 2006 and 2010, the Victorian public took to the airways, internet and streets protesting against poor-quality and damaging development over-riding appropriate process, and community rights and values. The call was and is for a planning system and policies that provide *more* regulation, *more* equity and natural justice, and *much more* certainty. The Discussion Paper not only doesn’t provide that, it goes in the opposite direction.

#### **3.4.1 Private Sector Investments**

It appears some are to be privileged with an ability to circumvent strategic land use planning, and likely scrutiny and accountability, in the pursuit of their vision of economic progress.

The following statement seems to confirm a two-layer planning system is proposed, with a new process allowing exceptions for private interests and innovative projects to get around planning scheme provisions (and presumably, transparent and accountable planning processes).

*“Private interests should be able to initiate innovative projects even if these projects are not contemplated by current planning controls. A new process needs to be established so that innovative proposals consistent with the strategy can be considered for approval.”* Discussion Paper, Page 24

We wonder if this would this be similar to the ‘good ideas’ of the Desal Plant and Bay Dredging, where getting it done was obviously more important than getting it right? Such secret and ill-conceived projects, defended as being in the public interest (and no doubt considered to produce “*net community benefit*”), circumvented proper evaluation and consultation processes. The result is that the Victorian public and environment will pay for these ‘creative’ and ‘innovative’ blunders for generations to come.

In passing, we advise that over-use or mis-use of the terms ‘creative’ ‘innovative’ and ‘flexibility’ (and ‘sustainability’ when used as a substitute for economic ‘viability’) has resulted in these words being seen as double-speak for ‘doing the community and environment over’, and for development that just doesn’t measure up.

In the Association’s view, there is no need whatsoever for a *new* (privileged) process for some. Rather, in the interests of democracy, responsible governance and society as a whole, there is a pressing need to stop promoting individual and private interests over the public interest, and to stop feeding the notion that if someone wants something, they are automatically entitled to it. *This is the exact opposite of what the community has said it wants.*

#### **3.4.2 One Size Doesn’t Fit All**

Any move away from ‘one-size-fits-all’ (page iv), not for the reasons included here but in terms of one-size-fits-all zones and planning controls, is supported. Likewise greater recognition of local context and the need for “*strategies for every local area to be unambiguous*” (page 16) is also a concept that is supported, although not in association with the terms ‘innovation’ and ‘creativity’ as included here.

However, it is not clear how this would or can be achieved, because at the same time, the Discussion Paper proposes moving away from regulation, and advocates a priority for (particularly economic) development, to the point of endorsing *ad hoc* planning scheme changes to suit what walks in the door. Our fear is that 'one-size-fits-all' is being replaced by 'one-rule-for-some'.

### **3.4.3 "Bottom Up"**

The Discussion Paper says the Metropolitan Strategy will represent a change from 'top down' to 'bottom up' thinking. Yet there has clearly been a 'top down' decision about the direction the Discussion Paper takes and the interests it will serve first, and those don't appear to be at 'bottom up' level. In many ways, the Strategy appears intended to represent the aspirations of the few over the needs and interests of the many.

## **3.5 A Polycentric City Linked to Regional Cities**

From our reading of the Discussion Paper, the proposal is not so much to 'link' as 'spread' the polycentric city across regional Victoria. Driving Melbourne's excess population out into the 'country' – to reduce pressure in over-populated Melbourne – is not supported. We also note that the policy to do this was made well before any known assessment of the costs of doing it, and further, that those areas of the State which have lost and/or need population are not targetted.

The Discussion Paper admits that *"incentives and intervention"* will be needed to achieve *"above trend"* growth (that is, more than is currently or naturally occurring). There seems to be a lack of rational and informed thought behind this proposal. *Have no lessons been learnt from driving above trend growth into now over-populated and infrastructure-challenged Melbourne?*

Some say it's cheaper to provide infrastructure to people in the country. Does anyone actually know what infrastructure is needed, and what the costs are? Has any thought been given to, and are there any figures for, concurrently providing infrastructure for Melbourne, outer suburbs **and** regional/rural Victoria, or how it will be paid for?

The Association can put forward examples of infrastructure deficiencies in Macedon Ranges which are likely mirrored or magnified in other areas outside Melbourne:

Rail improvements: Firstly, to be crystal clear, please be aware that the 'Very Fast Train' is a myth. *A Very Fast Train (or even a Fast Train) requires a dedicated special-purpose 'very fast' line between major cities.*

There is only ONE up and ONE down 'Fast Train' service per day on the Bendigo line, and it's not a whole lot faster than regular services, which mainly run an hour apart. Local towns would be better served if all trains stopped at all stations, but this would increase journey times.

'Improvements' will necessarily include putting back the second rail track, removed by the Bracks' government to reduce costs, between Kyneton and Bendigo (the lone track to Ballarat will also need duplication; both lines may require bridge replacement or modification).

Out here in the country, we would very much like:

- Bigger railway car parks at all stations (sold-off railway land may need to be re-acquired) and permanently manned stations;
- Longer platforms so we can alight onto a platform from any carriage;
- Separation of VLine and electric trains extended to Sunbury so we don't have to dawdle behind metro services; and
- A failsafe way of preventing signal failures (rain), braking issues (heat) and the myriad of other things that cause constant delays. *It is prudent to take an earlier train to allow twice the journey time to get to Melbourne, just to be on the safe side.*

*And that's just for the existing population.*

*Macedon Ranges: an **ENDANGERED** environment*

How about drainage, water and sewer?

Romsey needs \$14 million (2009 figures) just to fix existing township drainage issues. Then there's the 60cm pipes running into 40cm pipes and under-sized main drain (needs duplication) in Woodend, and Gisborne's century-before-last town drainage system that all new development just keeps plugging into.

Can you guarantee no more poo-pits, as we've had in recent years? *Note: a "poo-pit" occurs when town subdivision is approved and developed on the basis of sewerage connection being available, when it isn't. Effluent is instead temporarily (i.e. pending provision of sewer) directed to a roadside pit and disposed of by truck.* Increased loads on sewage treatment facilities can be tricky, with Woodend and Kyneton discharging to waterways in drinking water catchments. Old water supply pipes that tend to burst would probably benefit from future-proofing by complete replacement.

By the way, a permanent backup pump to maintain 24/7 water supply to above gravity feed areas would be nice, as would an electricity supply system that doesn't often fall over if the wind blows or a possum moves.

Then there's the problem with medical care. Kyneton has a hospital, but it doesn't do 'hospital' as in Melbourne. Treatment for emergencies and many other ailments is only available from Bendigo or Melbourne, an hour away. Specialists too. Ambulance services aren't the same as the suburbs, either.

Unmade roads are a bane, and deteriorate to ruts and potholes more quickly with additional traffic or wet weather. Bitumen seal, and drainage improvements, would see less damage to cars, and improved road safety. More bridges or replacement and expansion of existing ones, more school buses, more schools, kinders and day care. More community and recreation facilities, open space... More of everything, really. The Shire does have two heated swimming pools but Romsey wants one too, as well as public transport and a high school. Several towns would like 24 hour police stations.

We could go on...

The Discussion Paper talks of *new* infrastructure for *new* populations, but *existing* problems besetting *existing* populations will surely have to be addressed first or concurrently.

Has anyone bothered to ask people (not just Councils) in rural and regional Victoria how they feel about being rapidly populated, and losing rural land to residential development? Many who live outside Melbourne consciously accept lower levels of services and infrastructure in exchange for space, peace, a sense of community, better personal safety, and clean air. But the more people there are, the less of it there is.

*"Closer to Melbourne there are major opportunities for regional towns to grow. With the right support and long-term planning, towns closer to Melbourne in each of those regional corridors can also provide attractive regional living options within easy access of Melbourne's fringe."* Discussion Paper, Page 60

Considering how Melbourne 2030 has been applied outside the metropolitan area, and the undesirable effects it has had on Macedon Ranges, this statement (which includes the Bendigo corridor) seems a death sentence for rural municipalities and small towns that ring Melbourne - and for the forests, habitat, open water catchments, landscapes, heritage, farmland and non-metropolitan lifestyles they currently support.

Pushing Melbourne's population overflow into rural and regional areas is not a solution. It is simply creating new problems by pushing Melbourne's problems somewhere else. The cause of these problems is too many people, too quickly, and that needs to be tackled first.

### 3.6 Environmental Resilience

While a goal of reducing emissions is laudable, it is not enough to give the Metropolitan Strategy sustainability credentials. Gains from current population will be eroded by overall increases from additional population – every extra person adds to the overall consumption of power and resources, and generation of emissions.

Increased tree canopy coverage is recognized as having potential to reduce the urban heat island effect, but the Discussion Paper doesn't recognize that this process works better with more greenery than tree tops alone, and at the same time also champions high density residential and apartment development that is notable for not having enough room for trees or gardens, and elevated energy consumption.

How objectives will be achieved (or whether they can be) must be more clearly articulated. There also doesn't seem to be guidance for environmental resilience provided for regional cities and rural towns.

### **3.7 Green Wedges and Rural Areas**

If there are mixed messages and economic priorities elsewhere in the document, the Discussion Paper makes an art form of the same when tackling green wedges and rural areas, and the environment more broadly. The discussion is confused, and confusing.

There is a sense of lack of commitment to and genuine concern for the environment, to the point that the Association wonders if economists had authorship of the text.

Even after several reads of comments that seem to be about green wedges, rural areas, or rural areas beyond the green wedges, it still isn't clear which area text refers to, or what applies (or is intended to apply), where. There isn't enough information to make sense of what's proposed.

Much clearer is the Discussion Paper's approach to the environment as an exploitable commodity, and removing protective and defensive controls to create new economic development opportunities. The intent seems to be to use if not abuse the environment to accommodate economic aspirations. This is not sustainability in any sense, and under no circumstances is it supported.

#### **3.7.1 Discussion Paper Abandons Protection of the Environment**

*"There is a need to move beyond a 'protective' or 'defensive' approach to managing natural resources and seek opportunities to increase their value for the city and enhance their natural role. Discussion Paper, Page 60*

We fail utterly to understand how *"moving beyond 'protective' and 'defensive' approaches to managing natural resources"*, adds value to the city or the environment, or enhances anything natural. Move beyond, to what?

Elsewhere the Discussion Paper already advocates moving away from regulation. In addition, if the draft State zones are further indication, it is not *'moving beyond'* that is intended, but *abandoning* the long-established precautionary principle of regulating and restricting use and development to protect environmental resources, values and features. *These 'protective' and 'defensive' regulations and restrictions are the only reason we still have 'an environment' today.* Change, as proposed, can only serve certain interests, is expedient and short-sighted, and is not supported.

**Environmental assets and resources are non-renewable. They aren't making any more of them. Where do we go to get new drinking water catchments, waterways, rural land, landforms, forests, habitat, landscapes and soils when we've ruined what we have? Protection must be maintained and strengthened.**

#### **3.7.2 'Environment' Is Much, Much More Than 'Landscapes'**

It is difficult to comprehend that a document of the Discussion Paper's scope appears to think landscape is the key or only feature of environment and rural land. Yet the Paper repeatedly focuses primarily or solely on landscape. For example:

*Creating a green edge to the city: The Urban Growth Boundary [UGB] is not always reflected in the character of non-urban areas.... Melbourne could strengthen its natural and landscape character and help manage these areas, which extend beyond the green wedge – as a cohesive unit. Not all rural areas around Melbourne are identified for landscape values... Discussion Paper, Page 44*

*We know that landscapes will face changes and challenges over time. It is important to maintain the capacity of landscapes to adapt to these changes by linking habitat...” Discussion Paper, Page 60*

While it isn't quite clear what else these statements are saying, it is common ground that landscapes are important. But so too are the elements that contribute to them – for example, vegetation, landform and high quality soils used for non-industrial rural land use. Past and existing protection of core resources has played a critical role in maintaining the contribution these elements make to high quality landscapes. This must be recognized, as must the fragility of landscapes, and especially, the need for continued strong protection for both core resources and landscapes.

### **3.7.3 “Green Wedge Policy”?? Where Are We, And What Are We Talking About?**

*“The **rural area** around Melbourne is rich in biodiversity and conservation values. ... the city’s long-standing green wedges policy has protected some areas **beyond the fringe of the metropolitan area** from intensive urbanisation from the 1970s. It is expected that this will continue.” Discussion Paper, page 40*

- Which “*rural area around Melbourne*”: Green Wedges inside the metropolitan area, or rural areas/land/Shires outside the metropolitan area, or both?
- Which areas “*beyond the fringe of the metropolitan area*” have been protected by “*green wedge policy*” from the 1970s? It is very unclear whether this is a reference to current Green Wedge policy, or to Statements of Planning Policy applied to Yarra Ranges, Mornington Peninsula and Macedon Ranges by the Hamer government in the 1970s (they are not the same thing), or to something else.

Additionally, current Green Wedge policy/legislation applies to metropolitan municipalities (e.g. including Yarra Ranges and Mornington Peninsula) but does not apply to Macedon Ranges, or other Shires “beyond the fringe”.

If these areas are indeed those with 1970s Statements of Planning Policy, recently announced Localised Planning Statements are also relevant and they, along with the original Statements of Planning Policy, must be referenced.

Even if “green wedge policy” protection is “expected to continue”, what level of protection would be available?

- When Statements of Planning Policy were introduced, very prescriptive planning schemes were required to implement them.
- Loss of prescription in VPP format schemes made continued policy implementation very difficult.
- Proposed changes to rural zones leave almost nothing to work with in terms of protection. Changes include loss of Section 3 (prohibited) innominate uses; incompatible uses made as of right, or moved from Section 3 (prohibited) to Section 2 (permit required); and deletion of Section 2 conditions. *This is light years away from the controls considered necessary (from the 1970s) to provide adequate and appropriate protection.*

There must be much greater clarity, and specificity, to understand what is being proposed, and where, and how ‘protection’ is to be ‘continued’. *Genuine protection from damaging, incompatible uses, underpinned by policy/zone differentiation of environmentally sensitive areas, is warranted and would be supported.*

### **3.7.4 Green Belt**

*“Areas outside the Urban Growth Boundary need to be planned in the context of the wider regions of which they are a part. These areas extend beyond Melbourne into regional Victoria. These areas need to be planned to reinforce their agricultural and conservation values.” Discussion Paper, Page 60*

The Discussion Paper provides only a broad description of “Green Belt”. It is not at all clear what or where it would be, or what “Green Belt” means in terms of function. It may be good, or it may not – we just don’t know.

Even if “Green Belt” means protection and preservation of the environment and rural land in Green Wedges and/or environmentally fragile places such as Macedon Ranges, it is undermined and contradicted by the Discussion Paper’s concurrent promotion of residential growth in corridors, removal of regulation, moving beyond the ‘protective’ and ‘defensive’ approach to managing natural resources, and increased non-strategic economic development in draft State zones (including zones applied in the sensitive areas described above). *There must be more information and greater clarity.*

### **3.7.5 Economics Priority Displaces Environment Priority**

*“It is vital to ensure that tourism initiatives are supported through the planning system, both in Melbourne and its immediate region... Proposed planning zone reforms may provide further opportunities for tourism uses.”*

Discussion Paper, Page 18

*“Current planning controls in rural areas around Melbourne UNDULY LIMIT OPPORTUNITIES for tourism and other developments that would sit well in the rural landscapes and broaden the range of choices these areas offer.”* Discussion Paper, Page 60

These statements further confirm the Discussion Paper’s economics-first priority, and are not supported. They ignore the irreversible environmental damage to landscapes, as well as core and non-renewable environmental values and resources, such development causes. This significantly misses the ‘green’ in green wedges, ‘rural’ in rural areas, ‘high quality’ in high quality soils, and both ‘environment’ and ‘sensitive’ in environmentally sensitive.

Unbiased historical strategic assessment of all relevant environmental issues has repeatedly concluded such development must be prohibited or restricted in environmentally sensitive areas – to address a range of issues in order to protect the environment. For example, the planning system restricts unsewered single dwelling development in potable water catchments, yet here the Discussion Paper promotes unsewered mega-hotels and large scale tourism developments in catchments, as do the draft State zones. Similarly, high quality agricultural soils are an environmental and economic resource of State significance, but the Discussion Paper and draft State zones again make no differentiation in advocating damaging development. This approach will ultimately ‘kill the goose that lays the golden eggs’, with potential for wide-spread environmental, social and economic detriment. See also 3.7.6 below.

Placement of additional population, especially itinerant and uninformed tourist population, in areas of high bushfire risk also appears inconsistent with 2009 Bushfire Royal Commission recommendations. It seems to be taking risks, rather than avoiding them.

### **3.7.6 Water Supply Instead Of Water Catchments**

*“Rural areas around Melbourne host a range of natural systems that support city life. Ecosystem services such as water supply will play a significant role in Melbourne’s future as we respond to growth challenges.”*

Discussion Paper, Page 40

The Discussion Paper says water *supply* for Melbourne’s growth, but doesn’t go so far as to recognize water *catchments*, or the dependency of places other than Melbourne on the water they produce. It also doesn’t recognize that there are open drinking water catchments close to Melbourne (for example, in Macedon Ranges Shire) or draw a distinction between ‘open’ and ‘closed’ catchments.

The city’s water catchments are privileged by being ‘closed’ catchments; that is, most of the water Melbourne drinks is harvested from (often fenced) land in public ownership, protected from development and human/industrial contaminants.

On the other hand, in the ‘open’ water catchments which service parts of the metropolitan area, regional cities and rural towns, drinking water is harvested from **privately owned land**. Protection for the catchment can only be provided through regulation and restriction of use and development in planning schemes.

In 'open' catchments, drinking water is easily contaminated, and the storage capacity of public reservoirs and waterways can be reduced by siltation and sedimentation caused by earthworks, road maintenance and vegetation removal.

Incremental increases in septic tanks and other ways in which land in the catchment is used has a direct impact on water *quality* and the *quantity* of water available for public drinking supplies, and also impacts the cost of treatment which itself is not currently sufficient to remove all pathogens. It is in the public interest to apply the precautionary principle and strictly control how land is used in 'open' potable water catchments (i.e. Special Water Supply Catchments).

The Discussion Paper doesn't recognize this and, as with the draft State rural zones, promotes damaging development and contaminating land use in 'open' catchments. *If you wouldn't drink the water that runs off this land, please don't expect others to.*

### **3.7.7 Green Wedges**

There seems little in the Discussion Paper that cohesively or specifically relates the Green Wedges in terms of environmental values. This is not assisted by vagueness and significant confusion around which, and where, 'green wedge policy' currently applies.

The Discussion Paper in fact states at page 42:

*"Melbourne's Green Wedges must be an integral part of any urban open space strategy."*

Why? Green Wedges are not open space or public land; the land is in private ownership – unless of course the State government intends to acquire Green Wedge land for public open space. If not, the Association considers it is appropriate to replace the statement at page 42 with *"Protecting Melbourne's Green Wedges must be an integral part of land use strategies"*.

The Green Wedges are a critical component of the wider metropolitan area and warranted accurate and specific discussion of their importance, values, function and contribution, which is more than *landscapes* ear-marked for tourism and other development, and "brown wedges" (page 44). The Discussion Paper's failure to do this is considered a major omission.

### **3.7.8 Locking In The Urban Growth Boundary**

The Discussion Paper (page 58) suggests the current Urban Growth Boundary could be 'locked in'.

Most people probably thought it was locked in ten years ago, but with hefty subsequent UGB expansions into Green Wedge land, few would have confidence that another 'locking-in' would have any permanency. After all, the Metropolitan Strategy has a 40 year planning horizon and the Discussion Paper says (page 6) there is only 30 years' supply for suburban growth (with much of this to the north and west of Melbourne). What happens when that fills up? Where to then?

Yes, "lock in" the Urban Growth Boundary. In addition, as 'consent from both houses of parliament' has failed to prevent political decisions to expand the UGB, amend legislation to require a *referendum* before any future change.

### **3.7.9 Off-sets**

*"The Victorian Coalition government is currently reviewing native vegetation approaches. There are opportunities for net gain offsets to be better integrated with open space planning."* Discussion Paper, page 42.

The emphasis on off-sets and open space rings alarm bells. If additional vegetation is desired in public open space areas, there is presently no impediment to its establishment.

The need for off-sets comes into play when native vegetation is removed from development sites. Currently, such removal is firstly required to be avoided (not least to prevent moon-scaping of development sites).

The statement at page 42, promoting off-sets to be 'integrated with open space planning', seems to suggest increased removal of established vegetation (and habitat/bio-systems) is anticipated, with off-sets no longer required to be placed, firstly, on the development site. If so, this would be a backward step, encouraging the type of clear felling of development sites the Victorian Native Vegetation Framework and off-sets were introduced to overcome.

Again, what is being proposed simply isn't clear enough to make informed comment.

## 4 Conclusion

To have any hope of succeeding, a Metropolitan Strategy must have broader ownership than business and development interests, and it must do more than reflect and give primacy to those interests. It will otherwise be as, or more widely, despised as Melbourne 2030 which, in comparison, seems more inclusive and balanced.

Our reading of the Discussion Paper is that the Strategy which will flow from it will be too narrowly focussed on economic priorities to attract the broad support and ownership it will require. It truly does come across as more 'business as usual' – with over-whelming if not absolute emphasis on economics. It will not be a document that recognizes or serves the *real* social or public interest, or the interests of all Victorians and the environment we live in.

A genuine attempt to embed sustainability principles is needed, to ensure a much more 'rounded' future for Victoria than population and development growth while removing regulation and introducing elite processes to get it. This generates increased uncertainty, with reduced transparency and accountability. The Association's view is that more uncertainty, slap-dash processes, and privileges for development (including infrastructure) to over-ride and adversely impact communal and public realm values will be unacceptable to most Victorians.

The Association found lack of clarity, explanation and information across a range of issues to be an enormous problem, as were conflicting objectives and lack of reconciliation of these. It's as if only part of the story is here.

For example, while there may potentially be positives being proposed specifically for sensitive areas such as Macedon Ranges, it is all couched so ephemerally no clear picture or understanding of intentions is possible.

On the other hand, proposals such as accelerated population growth in regional, corridor and rural areas, and support for damaging changes to State zones, clearly pose dangers to rural and environmentally sensitive land, and undermine the ability to maintain the integrity of those areas. Our fear of this Strategy having the same 'urbanisation' effect as Melbourne 2030 also has not been allayed, particularly with the rather frenzied enthusiasm shown for very intense development in the Discussion Paper.

There are also difficulties in reconciling the almost 'cowboy' approach to all things economic and removing regulation with the concept of strategic land use planning, which must surely be the founding principle for a credible Metropolitan Strategy.

Overall, the document is a major disappointment. Unfortunately, it has the flavour of and seems to step back to the 1950s: a *mid-20<sup>th</sup> century 'vision' for the mid-21<sup>st</sup> century*.

It is hoped that substantial changes will be made, and an amended Discussion Paper exhibited that responds to issues and values in a much, much more equitable, sustainable and clearer way.

### **Macedon Ranges Resident's Association Inc: Contacts**

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#### 41. ASSOCIATION STATEMENT OF PURPOSES

In accordance with Section 5 (b) of the Act, the purposes for which the Association is established are:

- (1) To provide a non-sectarian and non-party-political forum through which financial Association members, through the Association's elected Committee of Management, may represent promote and protect the broad community interests and values of Macedon Ranges Shire residents.
- (2) To provide representation for the interests of Macedon Ranges Shire's residents in matters concerning the performance and service delivery standards of local, regional, state and federal governments and other bodies.
- (3) To ensure high standards of services and financial management are provided, responsible and accountable governance is delivered, and accessibility to governmental processes is maintained for all Shire residents.
- (4) To pursue, advance and defend the principles of democracy, natural and social justice, sustainability, and ethical and open governance.
- (5) To promote consistent application of the principles of equity, natural justice, ethics, transparency, accountability, good governance and sound management generally and in decision-making.
- (6) To uphold the right of the Macedon Ranges Shire's community to be consulted and to participate in all components of governance.
- (7) To ensure the high quality of the Shire's environment is conserved and enhanced through the:
  - a) Protection of environmental features and significance, and protection of natural, historic and scientific resources.
  - b) Preservation of community and cultural values.
  - c) Protection of rural land, landscapes and lifestyle values.
  - d) Fostering of sustainable economic development and population growth within the context of Purpose (8).
- (8) To promote Macedon Ranges Shire as a rural shire, and pursue the on-going recognition and protection of the Shire's:
  - a) Rural character, rural values, rural features, rural role, rural function and rural future.
  - b) Status as an area of State level environmental, natural resource and tourism/recreation importance, including retention of Statement of Planning Policy No. 8 – Macedon Ranges and Surrounds 1975 as policy relevant to Macedon Ranges Shire.
  - c) An area of natural beauty and conservation significance.
- (9) To form and express views on economic, environmental and social issues, policies, decisions and the like, in particular those which have the potential to adversely impact the wider community's interests and rights, or diminish or detrimentally alter the environmental importance and values of Macedon Ranges Shire.
- (10) To form and express views on political and election issues.
- (11) To support governmental and other bodies' consistent compliance with legislative and strategic requirements.
- (12) To monitor and review standards of governance, administration, community consultation and the application of democratic principles and natural justice within the Shire.
- (13) To associate and form alliances with those who share the above values.