

Heatherdale Community Action Group
submission on the
VPA Draft Ringwood Activity Centre Plan

Summary:

Heatherdale Community Action Group (HCAG) positions on the Victorian Planning Authority (VPA) Draft Ringwood Activity Centre Plan (August 2024) are:

1. supports the City of Whitehorse resolution for removal of the catchment area in Whitehorse from the Ringwood MAC plan
2. supports the City of Maroondah submission on the Draft Ringwood Activity Centre Plan
3. positions and concerns regarding the Ringwood MAC catchment
4. supports the City of Whitehorse position opposing changes to ResCode
5. supports the role and authority of Local Governments as the primary planning authority.

Positions:

1. HCAG supports the City of Whitehorse resolution for removal of the catchment area in Whitehorse from the Ringwood MAC plan

HCAG supports the following City of Whitehorse resolution:

Council Meeting Minutes 09 September 2024 10.4 (cont) Page 274

Writes to the Minister for Planning and Victorian Planning Authority asking that the 'catchment' area in Whitehorse (shown in Figure 1) be removed from the draft Ringwood Activity Centre Plan.

COUNCIL RESOLUTION Moved by Cr Cutts, Seconded by Cr Lane That Council:

- 1. Notes the Ringwood Activity Centre draft Activity Centre Plan prepared by the Victorian Planning Authority.*
- 2. Authorises the Director City Development to approve a submission to the Victorian Planning Authority about the draft Activity Centre Plan.*
- 3. Provides a copy of the submission on the Ringwood Activity Centre draft Activity Centre Plan to local members of parliament*

4. Writes to the Minister for Planning and Victorian Planning Authority asking that the 'catchment' area in Whitehorse (shown in Figure 1) be removed from the draft Ringwood Activity Centre Plan.

5. Should any part of the 'catchment' area remain in Whitehorse, that Council calls upon the Minister for Planning and Victorian Planning Authority to genuinely engage and consult with the Whitehorse residents, including the establishment of a Community Reference Group.

6. Notes that the Wurundjeri Woi Wurrung Cultural Heritage Aboriginal Corporation were invited to participate in the Activity Centre program, but due to the timeframes they have not engaged with the Victorian Planning Authority to date.

7. Encourages the Victorian Planning Authority to consult further with the Wurundjeri Woi Wurrung Cultural Heritage Aboriginal Corporation

CARRIED UNANIMOUSLY Spoke to the item: Cr Cutts, Cr Lane, Cr McNeill, Cr Barker, Cr Stennett, Cr Barker.

2. HCAG supports the City of Maroondah submission on the Draft Ringwood Activity Centre Plan

HCAG supports the City of Maroondah submission and notes that:

- the Ringwood Activity Centre proper with the three Strategic development sites is largely Maroondah's 2018 proposal developed by its planning department
- Maroondah claims the Ringwood Activity Centre proper has the capacity to accommodate ALL of the needed residential high-density apartments as well as business growth.
- Maroondah's submission is consistent with their community vision statement, *Maroondah 2040 – Our Future Together* - in particular, a Clean, Green and Sustainable Maroondah. We support Maroondah's key directions in that statement which are relevant to the Ringwood Activity Centre, and in particular the proposed catchment area:

- *Create and foster a culture within our community that is committed to protecting and enhancing the unique features of Maroondah's landscape, including our ridgelines, waterways, canopy vegetation, green open space and bushland reserves.*
- *Develop and implement an urban environment that enhances the desirable attributes of Maroondah to protect and value neighbourhood character, local history and cultural heritage.*
- *Encourage high density development in activity centres with access to high quality facilities, services and amenities*

From the Maroondah submission:

1.2. Background

The City of Maroondah's retail and commercial land use is focussed on its activity centres, the largest of which is the Ringwood Metropolitan Activity Centre (Ringwood MAC). Plans for the future of Ringwood date as far back as the 1940s and have included collaborative work between Council and the State Government as part of the former Transit Cities program.

The most recent plan for Ringwood is the Ringwood Metropolitan Activity Centre Masterplan 2018. This plan includes an expansion of the areas formally encompassed by the Centre, with large areas of residential land now incorporated into the MAC in recognition of the need for higher density residential development surrounding the commercial core.

The Masterplan, translated into the Maroondah Planning Scheme by Amendment C131maro in December 2021, includes precincts that have a range of foci, as shown in the map on the following page. In addition to the precincts designated as having a residential focus, sections of the Eastern Precinct and Ringwood Station Precinct shown as having preferred heights of 4-6 storey are residential in focus. Accommodation is permissible or as-of-right throughout the MAC, save for a portion of the Heatherdale Station Precinct. Preferred building heights throughout the Centre were carefully formulated, having regard to the physical characteristics of the MAC, with heights varying between 4-6 storeys and 15 storeys (to feature forms).

Five sites were identified as requiring a specific design response, and have no preferred height nominated.

The eastern-most of these is currently being redeveloped with a large multi-level aged care facility.

1 Maroondah 2040 Community Vision Updated June 2021. Maroondah 2040 | Maroondah City Council

2 Video footage is available at Live streamed Council meetings | Maroondah City Council. See 16 September 2024.

Open space within the MAC is relatively limited, but includes Ringwood Lake Park (8.5ha) which is located at the eastern end of the MAC, Staley Gardens, a small park located to the south of Costco, and the Mullum Mullum Creek, a linear open space that provides opportunities for walking and cycling along the northern boundary of the MAC.

3. Lack of information

Council is disappointed by the lack of information provided by the VPA in relation to very significant proposed changes to the Maroondah Planning Scheme and how these will impact on the existing provisions in the Maroondah Planning Scheme, particularly in relation to the catchment area.

Whilst Council was aware of and involved in the proposed VPA changes to the Ringwood Metropolitan Activity Centre Masterplan 2018, it was unaware until the week before the release of the consultation information that the catchment area was proposed to be included.

The information provided on the Activity Centres Program page (Activity Centres Program | Activity Centres | Engage Victoria) indicates that “a new type of planning ordinance that will give effect to built form controls” is being introduced. It then indicates that a new overlay “will support a streamlined approval pathway for compliant planning applications”.

The page then states: Using an overlay allows us to focus the scope of our planning controls on built form controls, like building heights.

Zones set out land uses, which are not the primary focus of the Activity Centres Program. Most activity centres are already zoned appropriately to accommodate residential growth alongside commercial uses for jobs and services.

A proposed new and complementary zone is being developed in parallel to ensure we have the appropriate tools to enable changes to zones where required in centres or precincts”.

The information is unclear and somewhat contradictory, noting that an overlay will be developed, but that a new and complementary zone is being developed to enable changes to zones where required in centres or precincts. It does not indicate if centres or precincts includes the catchment area.

4. Community consultation

4.1. Ringwood Activity Centre Program

Overall, Council is disappointed by the approach taken for the consultation on the Activity Centre Program and the proposed catchment area.

Initial VPA consultation was undertaken on the Activity Centres Program Phase 1 in March and April of 2024. The overview of the VPA consultation notes that while there is recognition that more homes are needed, there was concern about access to public

transport, open green spaces, community facilities, transport and car parking and placemaking and amenity.

The Engagement Summary Report August 2024 for the Ringwood Activity Centre Program provides a high level summary of the responses received during the consultation period. It states that the “feedback will inform our planning tools and guide our planning and decision making for the next phase of the Activity

Centre Program. This ensures input from community and stakeholders as well as technical studies can achieve appropriate outcomes for each activity centre.”⁴

In 2024, a Community Reference Group was formed by the VPA for the Ringwood Activity Centre Program with two meetings held (22 April 2024 & 5 September 2024).

The Engagement Summary Report August 2024 includes a summary of the key discussion points from the first meeting⁵. This includes support for diverse housing options and medium density development, increased connectivity and accessibility and expanded nighttime economy.

The report also notes the following key discussion points:

- *Many members raised a clear theme related to the value placed on the environment and greenery in the activity centre.*
- *Balance the development of new homes with the provision of open space.*
- *Opportunity for interesting and environmentally friendly building materials, not big concrete blocks.*
- *Less development along the bypass in the northern edge of the activity centre.*
- *Ringwood is unique because it is clean, green and sustainable.*
- *Emphasise the environment including encouraging bird life.*
- *More vegetation along paths.*
- *Maintain an Indigenous environment and vegetation*
- *Softening of ‘hardscapes’.*
- *Maintain views and vistas.*
- *Tree canopy should be part of the identity and not an afterthought.*
- *Development of buildings with green roofs and walls would contribute to the sustainable character of Ringwood.*

The Summary Report does not indicate how any of the feedback has been addressed in the Draft Ringwood Activity Centre Plan 2024.

In the interests of transparency and accountability, Council considers that it would have been useful to understand how the issues and concerns raised in submissions were addressed, as it appears that the concerns raised in feedback and by the Community Reference Group have not been incorporated into the Masterplan or the catchment plan, particularly in relation to vegetation and the natural environment.

The second round of consultation that commenced in September 2024, that introduced the surrounding catchment area, is considered to be ineffective. A broad consultation covering 10 activity centres lacks the depth needed to address Ringwood's specific needs.

The timing of this consultation has been poor with Council Election 'Caretaker' Period starting halfway through the consultation period, impacting on Council's ability to respond effectively.

There were no face to face drop in or information sessions provided except for the Community Reference Group, which was a small targeted group. One online session has been provided for each Activity Centre.

The survey provided online for feedback via the Engage Vic website (Participate | Activity Centres | Engage Victoria) contains leading questions including: "To what extent do you agree that we need to deliver more homes close to jobs, services, and transport around Melbourne?" and "What infrastructure upgrade would you like to see in Ringwood?". The survey provides only one opportunity to make specific comments on any concerns in relation to the plan.

It is not a genuine attempt to seek input on the change to the Ringwood Activity Centre and change to the surrounding catchment.

4.2. Maroondah 2050 consultation

Of relevance, Council has recently undertaken extensive community consultation on the Maroondah 2050 Community Vision which included:

- Broad community and stakeholder engagement (August to December 2023)
- Deliberative engagement via a Community Panel (February to May 2024)
- Targeted community and stakeholder engagement (January to June 2024)

Council has analysed the feedback from the Community Vision Survey that was undertaken as part of this engagement and has filtered the response from people living in Ringwood. The main themes were as follows:

In relation to the question "What do you love most about Maroondah?"

- The green nature of the area with countless trees especially the proximity to nature, parks and paths integrated within the neighbourhood, wildlife.
- The transport network, accessibility, and range of transport options.
- The sense of community and multicultural nature of the local community.

The consultation also included feedback from other engagement activities about things that people valued about Ringwood and Ringwood Metropolitan Activity Centre, in general most respondents noted that they highly valued Eastland and access to shops, transport and social and community facilities.

Respondents were asked to identify their top three priorities for Maroondah. The most common themes for Ringwood residents were as follows:

- Sustainability and the environment - with specific reference to environmental sustainability, sustainable practices and developing transport networks and bike routes.

- *Community involvement, diversity and inclusion.*
- *Provision of improved transport infrastructure*
- *Environment and promoting sustainable practices including improving greenery, protecting the wildlife and improving parks and gardens.*
- *Provision of community infrastructure namely playgrounds and parks, health facilities and transport links.*
- *Shopping precincts and maintaining or improving the shopping facilities, dining and image of the area.*
- *Community connections and engagement activities including supporting families.*
- *Maintaining the bushland and natural character of the area.*

In considering the overall priorities for Maroondah, the responses identified the following main themes:

- *The most common response related to protection of Maroondah natural environment (flora, fauna, views of the Dandenong Ranges) as the highest priority.*
- *The need to improve and provide for an integrated transport system, active travel options; walkability and a well connected transport network was identified as the second most common priority.*
- *The need to provide for more affordable housing and social housing; provide housing diversity and housing options. In relation to housing densities, impact of high density housing was highlighted as the need to provide for development parameters to ensure liveability.*

The consultation clearly outlines what is important to the Maroondah community and aligns with many of the themes identified in the Phase 1 consultation undertaken in relation to Ringwood. It is important that these issues are considered and addressed as part of changes proposed for Ringwood.

3. HCAG positions and concerns regarding the Ringwood MAC catchment

In principle we are supportive of Metropolitan Activity Centres (MACs) as they were originally intended.

However, we believe:

- The recent process has been rushed and is ill-considered. Information we have become aware of suggest that the Minister for Planning has set a deadline to have the proposed plan in place by December this year. We believe if this is the case (whether it is the minister or someone else driving it), it is irresponsible and will most likely lead to an unsatisfactory outcome for the community
- the outcomes of these considerations and potential changes to the Ringwood MAC, particularly the addition of catchment areas, is too important to get wrong and must not be rushed.

The proposal for catchment areas is highly sensitive and extensive. It is:

- The result of no consultation with Whitehorse and Maroondah Councils
- Released during the election caretaker period imposed on Councils, giving them limited opportunity to respond
- The thin edge of the wedge
- Dormitory focused - not business district focused or connected.

Frankly, it is totalitarian.

We note that in 2024, a Community Reference Group was formed by the VPA for the Ringwood Activity Centre Program with two meetings held – on 22 April 2024 and 5 September 2024.

The Engagement Summary Report August 2024 includes a summary of the key discussion points from the first meeting. This includes support for diverse housing options and medium density development, increased connectivity and accessibility and expanded nighttime economy.

The Summary Report does not indicate how any of the feedback has been addressed in the Draft Ringwood Activity Centre Plan 2024.

HCAG notes there seems to be a complete disconnect (which is also noted in the Maroondah submission) to listening and incorporating issues arising from Engagement Summary Report August 2024 and this next step – which is notable for its ignoring of anything but the planning proposal.

Which brings us to the quality of plan inviting this submission. It is frankly amateurish and lacking in substance. It looks very much like its authors looked on a map with no topographical or other detail features and did not go to the sites to understand the area. None of the previous community engagement feedback has been incorporated. Into this latest iteration.

We note that both councils have expressed disappointment that the catchment areas proposed within both councils were new and “came out of left field.” (Our words not theirs.)

Community engagement:

It appears to us that whilst earlier processes may have involved community engagement, this latest invitation is questionable.

We get the impression that it is just “going through the motions” and decisions have already been made – which is reinforced if there is a directive to have it all wrapped up by the end of the year.

HCAG is, as its name implies, a community action/advocacy group. We were unaware and not invited to participate in the Community Reference Group formed by the VPA for the Ringwood Activity Centre Program (many of our members are residents of Maroondah.)

Which begs the question: How were the participants selected and by whom? How independent and impartial was the process? We do acknowledge that the group seems to have identified accurately the issues, values, and aspirations/expectations desired by residents and others living in the area.

Why is it then that this latest “community engagement” totally ignores these inputs and seems to be pre-emptively headed in a different direction?

This latest round which proposes to incorporate these catchment areas seems to be an example of the community engagement you have when you don’t really have any community engagement.

Demographics

The proposed catchment areas present a significant change to the demographics within them.

- Apartment living is more suited to singles and empty nesters rather than families. For the Ringwood MAC to work the overall mix of the population is important and we are pessimistic about whether the VPA has got it right.
- It is very likely that these demographic changes will NOT increase the Ringwood MAC population by much and may in fact reduce it.
- People living in the catchment areas (if they are linked to the MAC rather than just dormitory residents commuting to other locations to work) are likely to make up the MAC workforce rather than be consumers. Consumers are likely

to leave or be forced out – reducing the scope of the MAC as a business activity centre.

- The attractiveness of the MAC to families is likely to be diminished. (We cite the diminishing mix of businesses in Box Hill and its growth as a dormitory suburb as an example – Which we have mentioned elsewhere in this submission.

This whole process seems to be more an exercise by the VPA and/or others in social engineering rather than genuine planning and city development.

Environment:

- Much of the proposed catchment area (all of that in Whitehorse and a substantial part of Maroondah) is in very environmentally sensitive areas. In Whitehorse it is close to Antonio Park, Yarran Dheran, Mullum Mullum Creek and Heatherdale Reserve – areas with greater biodiversity than Blackburn Lake sanctuary.
- Fauna and Flora are significant. The Mullum Mullum Creek is home to an exotic and endangered fish that could become extinct due to extra storm water runoff from the proposed intensive high-density apartments. Together with the Antonio Park and Yarran Dheran it serves as a valuable wildlife corridor.
- As with these areas north of the railway line, the area south of the rail line through to Kulnine Avenue is similarly significant. The area is notable for its remnant and substantial quantity of mature indigenous (to the area) trees that once gone will not be replaced.
- Developers, especially of the type of dwellings proposed, usually adopt the practice of “moon-scaping” the property being redeveloped and building the maximum footprint structure they can get away with. There is little opportunity for replanting any vegetation, especially canopy trees and those of the indigenous variety.
- Similarly, the catchment areas in the Maroondah area are sensitive and subject to the same arguments.
- Frankly, what is being proposed by the VPA is not responsible, well thought out planning – it is blatant environmental vandalism.

- HCAG stands by its support for both Maroondah and Whitehorse Councils in NOT proceeding with these catchment areas. They are unnecessary and detrimental environmentally and in every other way.
- However, should the council positions be ignored we consider a detailed comprehensive environmental impact study and statement are essential. One that could not possibly be completed by the end of this year. We think it should be independent and conducted by an organization with the prerequisite expertise.

Ambience:

- The proposed catchment areas are quiet and charming with family friendly livability, quiet streets and amenities for young people.

Historical context:

- For example, but not limited to, Schwerkolt cottage (immediately adjoining a catchment area) and the Heatherdale homestead overlooking the rail cutting and in the middle of a catchment area.)

Health and Safety:

- The proposed catchment area at Heatherdale has Health and safety issues. On the Maroondah side of Heatherdale Road, it proposes 6 storey developments backing onto the main electricity substation and looking down on the incoming high-tension lines AND looking into Recycal with its problematic history of serious air pollution over 20 years.
- Are these the only health and safety issues in the proposed catchment areas?

Topography:

- The whole area in question is very hilly, especially in, but not limited to, the Whitehorse catchment area and the Loughnan Hill area north of the Ringwood MAC and Ringwood bypass road. This concerns us because it appears very evident that the VPA has merely looked at a map without visiting the sites and has no idea or regard for the topography. That also appears to be the case with a number of other aspects of this proposal.
- The impact of this hilly topography is to accentuate buildings of greater height, under no circumstances should some areas be included as a catchment area.

These include, but are not limited to the Whitehorse catchment area and the Loughnan Hill area north of the Ringwood MAC and Ringwood bypass road (as previously identified).

Capacity of existing infrastructure to handle the increased load:

- Maroondah Council has made very clear that the previously defined Ringwood MAC area with developments as proposed has enough capacity to accommodate ALL population growth as proposed. So why is the VPA so determined to add these proposed catchment areas without proper consultation or community engagement?
- All increases in housing density to date (eg multiple apartments per block) use the assumption that the existing infrastructure has enough capacity. It does NOT have infinite capacity and this VPA proposal pushes the boundary. Who (which level of Government) is going to pay, how much is it going to cost, has it been allowed for in budget funding assessments, etc?
- HCAG opposition to developer sought and usually granted car parking waivers. The local streets simply do not have enough capacity for large volumes of parked cars. We already have near gridlock in Purches Street at pick up- drop off time at the scout hall.
- Street parking capacity - especially if waivers are granted.

Traffic in the Whitehorse proposed areas:

- There is extremely limited access and egress from the Whitehorse proposed catchment areas to the Ringwood MAC.
- In fact, there are only three roads leading out of the Whitehorse catchment area south of the railway line to Ringwood and they are:
 - Cochrane Street - which has limited right turn capacity towards the Ringwood MAC.
 - Heatherdale Road - which (also) has limited right turn capacity towards the Ringwood MAC. (And which is approaching 19000 cars per day, most of which are using it for its intended purpose as a interconnecting road to Whitehorse Road in the north and Canterbury Road in the south.) This makes Heatherdale Road very problematic for access and egress of vehicles from the proposed catchment area.

- Molan Street (which is constricted by limited turn capacity from Heatherdale Road turning as well as convoluted access/egress to and from New Street
- The proposed Whitehorse catchment area on the north side of Whitehorse Road also has extremely limited access and egress to the Ringwood MAC.
- In Maroondah the focus of the road system is to bypass the Ringwood MAC – not feed traffic into or out of it.

Public transport:

- As we understand it, this proposal was jointly put together and released by the VPA and Public Transport Victoria. Other than the catchment areas being around rail stations (Heatherdale and East Ringwood) there is no consideration of public transport connecting the catchment areas to the Ringwood MAC. The rail stations are suitable for longer trips – they are NOT SUITABLE for short one station to station legs. What realistic public transport proposals exist to do so and what mode(s) of transport is proposed?
- This begs the question – what and who do these catchment areas really serve?
- There is absolutely no evidence of ANY consideration of using public transport to move people from catchment areas to or from the Ringwood MAC, or around the MAC itself. As previously stated, the type of public transport needed to do so is NOT heavy rail.

Metropolitan Activity Centres (MACs):

Our understanding of MACs is they were created to become dispersed business districts relieving the pressure on the Melbourne CBD and the related radial road and public transport system. As part of the Ringwood rail corridor, that is precisely the role of Heatherdale and East Ringwood stations ie to feed commuters primarily to the Melbourne CBD and inner areas of Melbourne.

- The purpose of MACs is becoming clouded and corrupted. Has the VPA **or those directing its focus** surreptitiously changed the-purpose of MACs?
- They are in fact becoming high density dormitory suburbs where public transport commutes people out of them to workplaces rather than the other way around. Box Hill (which is chosen as the example here because it is further

down the process than Ringwood) is a case in point. Developers are building high rise/high density apartments and BUSINESSES ARE MOVING OUT.

- The reality is **developers** (whose purpose is to maximise profits rather than provide good planning outcomes) have become the defacto planning “authority” in Melbourne – not the VPA and not Local Government (which has been deliberately marginalized as a planning authority.) This is reinforced by actions such as developers having appeal right but not the public and individuals

The Victorian Planning Authority:

- The Victorian Planning Authority has demonstrated from its proposal for the Ringwood MAC catchment area that it is not capable and/or does not have enough authority or independence from State Government to make informed or responsible proposals.
- Why has it not put forward or considered other alternatives that do not impact the livability and sustainability of Whitehorse, Maroondah and the rest of Melbourne to the extent it does with this male macho “mine bigger than yours” mentality? The assumption is that the big Melbourne direction being pushed and applied is the best and it is simply WRONG.
- Does it realize that at the present growth rate of Melbourne at 2% per annum and compounding, the population of Melbourne by 2100 will be at least 22 million and possibly as high as 24 million (or 80% of the current population of the whole country)?
- Has it conveyed this to the State Government and has it shared it with the residents of Melbourne?
- VPA’s questionnaire regarding the Ringwood MAC proposal. There is little opportunity for a respondent to put his/her views forward. The questions asked are limited and lean towards an acceptance of the proposal. Is this a case similar to a lawyer in court “leading the witness”?

4. HCAG supports the City of Whitehorse position opposing changes to ResCode

HCAG believes the proposed changes to ResCode are undemocratic and potentially unconstitutional. VCAT has moved, and will continue to move, at an accelerating rate away from being an independent and impartial tribunal to a developer's advocate. **Is there a case for abolishing VCAT's authority to hear and deliberate on planning matters?**

The changes to ResCode have a totalitarian feel about them - as does the way in which the expansion of the Ringwood MAC through catchment areas has been proposed.

HCAG supports the following City of Whitehorse resolution:

Council Meeting Minutes 09 September 2024 Page 6 5 Urgent Business

5.1 Submission to ResCode Draft Deemed to Comply Standards

COUNCIL RESOLUTION Moved by Cr Lane, Seconded by Cr McNeill

That Council consider the matter as an item of Urgent Business.

CARRIED UNANIMOUSLY COUNCIL RESOLUTION

Moved by Cr Lane, Seconded by Cr McNeill That Council:

1. Notes the draft ResCode clauses with 'deemed to comply' provisions prepared by the Department of Transport and Planning (DTP);

2. Expresses serious concern that DTP has not broadly consulted with Councils and the community on these draft clauses and seeks that additional formal public consultation is undertaken prior to implementation of the new standards;

3. Authorises the Director City Development to approve a submission to the Department of Transport and Planning about the draft clauses, which will (broadly) include:

a) Concern about the proposed 'deemed to comply' model.

b) Opposition to the removal of neighbourhood character considerations and removal of third-party appeal rights at VCAT as currently drafted.

c) Suggestions on how improvements can be made to improve the supply of housing;

and

4. Sends a copy of the submission to the Minister for Planning and local members of State parliament.

CARRIED

Voted FOR item: Cr Barker, Cr Carr, Cr Cutts, Cr Lane, Cr Liu, Cr Massoud, Cr McNeill, Cr Munroe, Cr Skilbeck, Cr Stennett (10)

Voted

AGAINST item: Cr Davenport

(1) Spoke to the item:

Cr Lane, Cr McNeill, Cr Cutts, Cr Skilbeck, Cr Carr, Cr Barker, Cr Davenport, Cr Massoud

We note there has been no consultation with the City of Whitehorse regarding the proposed catchment area within its boundary. Why was Whitehorse not even informed of the proposal before its release for public comment?

5. HCAG supports the role and authority of Local Governments as the primary planning authority

HCAG supports the role and authority of Local Governments as the primary planning authority (albeit via delegation) for ALL of Metropolitan Melbourne, regional cities and rural Victoria. We oppose moves to weaken this critical role of Local Government.

It is **VERY** clear that over the last several years there has been a systematic process of withdrawing and/or diluting the authority of Local Government, especially in its responsibility to act as a genuine third level of government. It is becoming more and more like an administrative arm of State Government with less and less governance authority. This is not consistent with the Victorian constitution which recognises local government as the legitimate third level of government. This presents both a constitutional challenge and a democratic challenge going forward.

This is more (and extremely) evident in the area of planning and city development than any other area of local government activities, and the way that the Ringwood MAC in Maroondah (and the Box Hill MAC in Whitehorse) is being handled exemplifies this. The handling has nothing short of a totalitarian feel about it.

As stated earlier, the present growth rate of Melbourne at 2% per annum and compounding, will see the population of Melbourne by 2100 at 22 million and

possibly as high as 24 million – that is, 80% of the current population of the whole country.

Has the VPA conveyed this to the State Government and has it shared it with the residents of Melbourne?

If this growth rate continues Melbourne will systematically and progressively move from one of the most livable big cities in the world to one of the least livable. This process and its outcomes are **NOT** sustainable.

The creation of MACs is just another type of urban consolidation which will do nothing to stem this growth rate.

The theory that MACs will curb the need for travel within the Melbourne metropolitan area is flawed. This is just a part of a social engineering experiment.

The amount of increased infrastructure needed to accommodate this growth is financially beyond the state (and certainly Local Government) ability to address it.

For example, the Suburban Rail Loop will have a capacity of 400,000 passengers a day if it is ever fully completed - given its \$200 billion price tag. This is beyond the means of the state. Its contribution to moving a city of 20 plus million people is next to zero. No cost benefit analysis has ever been done and there is NO cost benefit to be realised.

The VPA has demonstrated from its proposal for the Ringwood MAC catchment area that it is not capable and/or does not have enough authority or independence from State Government to make informed or responsible proposals.

Why has it not put forward or considered other alternatives that do not impact the livability and sustainability of Whitehorse, Maroondah and the rest of Melbourne to the extent it does - with this male macho “mine's bigger than yours” mentality? The assumption is that the big Melbourne direction being pushed and applied is the best and this is simply **WRONG**.

Again, has the VPA conveyed this to the State Government and has it shared it with the residents of Melbourne?

VPA's questionnaire regarding the Ringwood MAC proposal provides little opportunity for a respondent to put his/her views forward. The questions asked are

limited and lean towards an acceptance of the proposal. This seems to be “leading the witness”?

Why have alternative solutions not been considered for coping with population growth? *(See HCAG Website article “Growing Pains.” Included in this submission)*

In particular why hasn’t decentralisation into regional cities been given prominence?

Planning and community/city development in Victoria and particularly in the Melbourne metropolitan area has become conflicted and convoluted by who is the relevant planning authority. Over many years planning authority has been largely delegated to Local Government Councils. These councils collectively have by and large done an exceptional job in creating a large, charming, livable city filled with ambience and vitality. It has consistently been voted by international assessors as one of the most livable big cities in the world. This is all the more significant since it is four or five times the population of other cities laying claim to most livable city. We suggest it is in no small part due to the excellence, knowledge, capability, engagement with its community, and the focus on delivering responsible planning outcomes of local government councils throughout Melbourne.

State Planning up until now has been a policy provider. In recent times however it has increasingly become what seems an authoritarian planning authority trying (and all too often failing) to make responsible and reasoned decisions. This is exemplified in the Ringwood MAC (and Box Hill MAC – the latter with an initial catchment area similar to the proposed Ringwood MAC which has now been expanded to encompass 25% of the City of Whitehorse - which has now had its planning authority excised from it in the area in question.) Is this the hidden agenda for the Ringwood MAC?

Is this then the “thin edge of the wedge”?

In the mean-time many developers push the boundary and refer their excessive development proposals to VCAT. As often as not they seek and are granted off street parking waivers that result in excessive on street parking, congestion, and at times local street gridlock.

All of which raises the question - who/what is the real planning authority in Melbourne?

We put it to you that, at least in a de-facto sense (and in no small part due to VCAT becoming a developers' advocacy rather than an independent and impartial tribunal and the res-code changes) that **DEVELOPERS** are the real "planners/city developers" of Melbourne. This is extremely concerning since their focus is on maximum return, minimum compliance, highest density, and so on with little or no regard for livability, amenity, open space, service provision, recreational facilities, the environment, good planning outcomes etc.

Why the rush to have in place by December 2024?

Why has all the previous good work been disregarded?