

Glenn and Barbara Ford
"Colglenn"
625 Holden Road
DIGGERS REST VIC 3427

17th July 2009

Mr Steve Dunn
Director Policy and Strategy
Growth Areas Authority
PO Box 1166
CARLTON VIC 3053

Dear Mr Dunn

OUTER METROPOLITAN RING/E6 TRANSPORT CORRIDOR PLANNING ASSESSMENT REPORT

We refer to the Outer Metropolitan Ring/E6 Transport Corridor Planning Assessment Report (June 2009) and provide this submission in relation to the proposed changes to Melbourne's Urban Growth Boundary and proposed alignment of the Outer Metropolitan Ring/E6 Transport Corridor. Please refer to attached document taken from page 168-172 of "Delivering Melbourne's Newest Sustainable Communities", which provides a map of options and evaluation of options CS1, CS2, CS3, CS4 and CS5.

Location of our land affected by the OMR route CS5 in the Shire of Melton:
Allotments 803-850 & 753-801 Plumpton Rd and 625-689 Holden Rd in Plumpton.
Melways reference map 353 H2 (dot on map marks Colglenn).
Please refer to design drawing map sheet 6 attached.

We, Glenn and Barbara Ford, are the landowners and business operators of the 320 ha "Colglenn" farm which is bounded by Plumpton Road to the east, Holden Road to the north, Leakes Road to the west and private property to the south. Our family purchased "Colglenn" a soldier settlement size in 1950 and we have continued a broad acre farming business. We are one of the few remaining farmers left within the Shire of Melton whom derive their main income from the land.

Having reviewed the Planning Assessment Report, we submit as follows:

1. The consultative process did not enable us to participate in the consideration of the Investigation Area for inclusion of land within the UGB and the proposed alignment of the OMR. The chronology of events of the consultation process is as follows:

14 November 2007	The Minister for Roads and Ports announced the preliminary planning study into an outer metropolitan transport corridor stretching from Werribee to Mickleham. A plan was published on the VicRoads' website which illustrated that the proposed transport corridor would <u>not</u> impact upon our property.
2 December 2008	The Minister for Planning announced the proposed Investigation Areas for inclusion of land within the Urban Growth Boundary. The Investigation Area was defined as being along our southern property boundary. It was noted in the material issued by the Government that submissions would <u>not</u> be considered in relation to land outside the designated Investigation Areas. Accordingly, as our property was not

- included within the Investigation Area, we were not provided with the opportunity to make a submission to the Growth Area Authority.
- 2 December 2008 Following the announcement by the Minister for Planning, our neighbour inquired with VicRoads as to whether his property and our property was affected by the proposed OMR.
- 22 February 2009 Joan Gilmer of VicRoads advised my neighbour via email that “..at this stage I can advise you that your property.....and your neighbour's property on the SW corner of Holden and Plumpton Roads intersection are outside the current study area”.
- 17 June 2009 The Government released the Delivering Melbourne's Newest Sustainable Communities. The Outer Metropolitan Ring/E6 Transport Corridor Planning Assessment Report recommended an alignment of the proposed transport corridor through our property.
- 22 June 2009 First official notification received by mail to advise us that our land would be affected by the OMR.
- 27 June 2009 Attended Melton information day. We felt this consultation time frame for us to digest and process the information and consequences of this OMR project was inadequate. By the time we received information requested we had only a few days to prepare our submission.
- 17 July 2009 . Submission due.

We note that as our property was not included within the Investigation Area (in fact, the Investigation Area abuts our southern boundary), we were not provided with the opportunity to make a submission to the process. We submit that this process was flawed as we were not provided the opportunity to participate in the consultation process that commenced on 2 December 2008.

2. We do not support the recommended Caroline Springs Options Analysis which recommends Option CS5 and support an alignment generally in accordance with Option CS4.

Our reading of the assessment which has been undertaken together with the further information which we have provided in this submission confirms that the alternative option is worthy of further consideration at this very early stage of the planning process.

The analysis is as follows:

a) Technically Feasible – Criteria Rating : Satisfactory

Similar to each of the options, the Planning Assessment Report confirms that Option CS4 is technically feasible.

b) Biodiversity – Criteria Rating : Satisfactory/Well

The **Deanside Wetlands** has been omitted from this report. The CS5 interchange at the Western Highway Rockbank affects 50% of the area. This is obvious on the aerial photograph (*see copy attached*).

The Planning Assessment Report comments that Option CS4 would have a reduced impact on Plains Grassland (endangered) passing through lower value vegetation than Option CS1. The Report does not take into account in its assessment that Option CS5

dissects an area designated with "Highest Native Vegetation Importance (DSE)" on the east side of Plumpton Road. An alternative alignment such as Option CS4 would not impact on this native vegetation.

c) Cultural Heritage – Criteria Rating: Not Assessed

The Planning Assessment Report states there has not been a cultural heritage assessment undertaken for Option CS4, however it is noted that the recommended Option CS5 is assessed as Satisfactory/Poorly as the alignment would affect 11 artefact scatter sites.

However there is no reference in the analysis that Option CS5 will cause the destruction of an 1800's 1.5 kilometre dry stone wall that marks the boundary of our farm along Plumpton Road (*see attached photographs*). The analysis of the options has not considered this important cultural heritage asset.

We understand the magnitude of issues to be considered within the Planning Assessment Report, however our impression is that the Report has either (at best) not undertaken sufficient field work or (at worst) been selective in the identification of issues in the assessment process.

Indeed, the *Delivering Melbourne's Newest Sustainable Communities Community Identity Fact Sheet* highlights the importance for new development to respond to the existing sense of place and cultural identity within a region and to respond to its context.

The Fact Sheet states as follows: *(copy attached)*

" At a smaller scale, dry stone walls common across the western and northern plains and constructed many years ago form a link with the past and a sense of cultural identity. Similarly windbreak plantings- often Sugar Gum and Conifers- offer a link with past practices and can form markers in a new community. Even the geometry of 19th Century subdivision patterns is worth preserving in some locations."

There is no reference to this cultural asset in the many reports that have been prepared. We submit again that an option similar to Option CS4 would enable the preservation of this heritage asset – there is an opportunity for this asset to be integrated with future development.

Further, the Option CS5 will destroy the 25 year old conifer plantation established along the Plumpton Rd boundary. This is a valuable wind break which provides shelter for stock, prevents serrated tussock seed from blowing in, and helps shield us from road traffic. There has been no reference made in the reports to this important landscape asset.

d) Socio-Economic Impacts

Boral Quarry – Criteria Rating: Very Well

The Planning Assessment Report states that Option CS4 would lessen the impact on the Boral Quarry as the OMR rail link to the Ballarat-Melbourne Railway line would be further north-west.

Residents' Amenity – Criteria Rating: Satisfactory

Option CS4 is assessed as Satisfactory as the option would impact on 41 houses/businesses including at least one service centre. The Western Freeway interchange would impact on known development proposal north of Rockbank.

Option CS5 will result in the loss of 10 homes between Beatty's Road and Holden Road, of which 4 of these are our neighbours on the east side of Plumpton Rd, immediately south of Holden Rd. In our small rural community there are 8 homes severely affected. Our rural community will be obliterated. It is proposed that these properties will remain outside the UGB. A greater distinction needs to be given to properties proposed to remain within the Green Wedge compared with properties within the UGB.

The Shire of Melton is supporting our rural community in their submission. With reference to the section 3.3.3, "Other OMR Alignment Impacts", their recommendation is;

"That Vicroads review alignment options for the OMR to determine whether impacts on existing communities (in particular Chartwell and the rural community south of Diggers Rest) can be avoided.

It is not evident that the analysis has explored options to maintain residents' amenity within our locality. The alignment could be designed to utilise the large tracts of vacant land on the east of Plumpton Road where the land is already encumbered by the Melbourne Airport Environs Overlay, Power Transmission Lines, Gas Pipeline and Optic Fibre Cable. It is clear, however that the majority of this land was included within the Investigation Area and a speculative development has been proposed for the land. We suggest that this proposal has largely influenced the analysis of the options rather than a proper assessment of residents' amenity.

(please refer to design drawing map sheet 6, aerial photo and a copy of the Shire of Meltons relevant page of their submission attached)

We note again that we were not included within the Investigation Area and received advice from VicRoads that our property was not currently within the study area for the proposed OMR. Subsequently the property within the Investigation Area north of the Melton Highway has not been dissected by the proposed OMR and yet our property has.

Cultural Impacts – Criteria Rating: Not Assessed

This criteria was not considered in relation to CS4 and CS5.

Impact on Melbourne @ 5 Million Investigation Areas – Criteria Rating: Poorly

The Planning Assessment Report states that the option is assessed as poorly. It notes that while it allows for the short term expansion of Caroline Springs area, it significantly reduces flexibility to maximise employment and residential outcomes between Melton and Caroline Springs. An important outcome for Melton is to include improved residential and employment outcomes. The report states that adopting the CS4 alignment to the west would embed the historic perceived differences between the two areas.

We submit that this assessment overstates the impact on the flexibility of the growth area which has particularly been influenced by speculators who have actively participated in the UGB Review process.

The land area between the existing Urban Growth Boundary and the alignment of Option CS4 would be of sufficient scale to enable effective precinct structure planning to occur.

Option CS4 would provide a sufficient footprint to plan effective neighbourhood design outcomes together with scope for the integration of employment nodes.

It is premature to preclude Option CS4 at this early stage based on a perceived lack of flexibility for the Investigation Area prior to preparation of the Growth Area Framework Plan and the subsequent Precinct Structure Plans within the Growth Area. It is through the proper planning assessment of the Growth Area that consideration will be given to the use of the land (residential, employment, mixed use, public utilities), the appropriate road network and the connectivity and relationships between neighbourhoods within the Growth Area.

3. The recommended exclusion of the land to the north of the Melton Highway and east of Plumpton Road from the proposed Urban Growth Boundary provides greater flexibility for the alignment of the road generally in accordance with Option CS4. Indeed an alignment could be determined that would reduce the number of property owners and dwellings that would be impacted by the alignment.
4. The land to the north of the Melton Highway and the east of the Plumpton Road is affected by the Melbourne Airport Environs Overlay – Schedule 2. (MAEO2). Given the existence of the overlay, the alignment of the transport corridor is an appropriate land use on this land.
5. As noted previously, our land has not been included within the Investigation Area. Option CS5 on the land would lead to the fragmentation of this large landholding impacting on its viability for both continuing agricultural-based uses together with potential urban development. In terms of long term growth area planning, it is important that consideration be given to large landholdings that have not as yet been fragmented. Option CS4 would maintain flexibility for the future planning of land to the west of Plumpton Road.
6. The OMR reservation will dissect three of our 40 hectare lot which front Plumpton Rd thus reducing each allotment to below the current minimum 40 hectare subdivision size. This will restrict our ability to obtain planning approval for future development. In addition, these lots will lose their access to Plumpton Road.
7. There has been no consideration given to the ongoing economic benefit of the farm operations which will be adversely affected by the proposed alignment. At the 35000 mark, the south east corner of our farm is isolated between the OMR and Plumpton Rd. It would therefore be impractical to continue to farm given the difficulties which would be incurred with the movement of livestock and agricultural machinery due to the high volume of traffic on Plumpton Rd. At the 35500 mark, we would lose a dam and more trees. Plumpton Rd works may alter water runoff and we could lose our capacity to fill a large dam near the house and sheds. In addition, the land that would be lost is the best arable land and water course within the property. Accordingly, this proposal will reduce the farm's productive capacity.
11. The impact of a freeway of this magnitude will not be conducive with our current rural environment and proximity of our home to the OMR and Plumpton Rd over pass.
12. Our property is only 28 km from the Melbourne CBD in close proximity to three of Melbourne's residential and industrial growth areas of Melton, Hume and Brimbank with a proposed transport corridor proposed to service the land. The *Delivering Melbourne's Newest Sustainable Communities* reports have not initiated any strategic direction in relation to the future sustainable use of agricultural land with the increasing encroachment of urban development. Nor has the report provided any commentary on how the land outside the UGB and the OMR will be sustainable in the long term. A co-ordinated integrated land use and transport planning process is required that examines the future development of land both within and outside the current Urban Growth Boundaries, particularly for land in close proximity to existing growth areas and connected to metropolitan Melbourne. The report assumes that the OMR will provide a hard edge between

urban and rural development. We submit that more strategic planning needs to be undertaken to examine the benefits of the proposed OMR in terms of adjoining land uses as part of the overall growth area planning of Melbourne.

13. The Planning Assessment Report refers to the proposed termination of Termination of Holden Road at the Melbourne - Bendigo rail line which will land lock property at the east end of Holden Rd. This is the local community's preferred access route for travel to Melbourne. The termination of Holden Road would prevent access for emergency vehicles such as the CFA in the event of wildfire for the land between the OMR and Hillside. To address this issue we suggest VicRoads refer to the previous work undertaken in relation to the proposed closure of Holden Road as part of the Service Centre development on the Calder Freeway. An alternative route offered was explored to provide a road through the Bob Jane property along the rail line to connect to the Calder Park Drive and access the freeway.

In summary, we submit that:

- a) An alternative option similar to Option CS4 would provide a suitable alignment of the OMR when assessed against the assessment criteria. A number of issues have been omitted from the analysis and it appears that the recommendation of Option CS5 has been skewed to benefit the interests of the land speculators to the east of Plumpton Road. The Planning Assessment Report suggests greater flexibility for effective growth area planning with the recommended alignment CS5. We submit that a similar alignment to Option CS4 would provide flexibility for future growth area planning and respond more favourably to the issues outlined in this submission.
- b) We have to date been excluded from the consultative process undertaken for consideration of the proposed Urban Growth Boundary and the Outer Metropolitan Ring Road and accordingly the interests of our land have not been adequately considered compared to other landowners' interests.
- c) The proposed alignment will have an adverse effect on the productive capacity of our farm.
- d) Integrated land use and transport planning must be broadened to consider the future planning of land both within and outside the proposed UGB and the OMR.

Should you have any questions in regards to this submission, please contact us on;

- telephone 9740 1281
- email colglennfarm@gmail.com

Given that we have had a short time frame to respond and collect data and references we would welcome the opportunity to discuss our submission further in person.

Yours sincerely,

Glenn and Barbara Ford