

Submission Draft Ringwood Activity Centre Plan



September 2024



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1. Executive Summary

1.1. Introduction

This submission is consistent with Maroondah City Council's community vision, *Maroondah 2040 - Our Future Together*¹. In particular, a Clean, Green and Sustainable Maroondah. There are a number of key directions of particular relevance as per the below:

- 4.4 *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.*
- 6.5 *Develop and implement an urban environment that enhances the desirable attributes of Maroondah to protect and value neighbourhood character, local history and cultural heritage*
- 6.6 *Encourage high density development in activity centres with access to high quality facilities, services and amenities*

This submission has not been formally endorsed by Council, due to the Election 'Caretaker' Period for Council elections which commenced on 17 September 2024, and is accordingly being submitted under delegation.

A report prepared by Council Officers was considered at the 16 September 2024 Council Meeting, which outlined the key issues that would be addressed in this submission. Key themes raised by Councillors that emerged from the discussion during the Council Meeting have been included in this submission².

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.



Existing Activity Centre Zone precincts and preferred heights

2. Changes to the Ringwood MAC Masterplan 2018

It is noted that minor changes were made to the Draft Masterplan 2024 during the course of the Stage 2 VPA public engagement. Council's comments relate to the document available on the VPA Ringwood Activity Centre website (Ringwood Activity Centre - VPA) on 4 September 2024, rather than that available on 29 August 2024.

Council thanks the Victorian Planning Authority for its recognition of prior strategic planning work for the Ringwood MAC and for working with Council to update the Ringwood Metropolitan Activity Centre Masterplan. Updates are largely restricted to the introduction of additional guidance for three sites that until now had been nominated as requiring a 'specific response' within the Masterplan.

The guidance proposed increases the potential dwelling and employment floorspace yield of the Centre and Council is supportive of the extent of built form anticipated by the Draft Masterplan 2024. The balance between overall heights, building setbacks, and measures to encourage a 'suite of forms' rather than a single development envelope on each strategic development site is appropriate.

2.1. Nature of requirements

2.1.1. Deep soil planting area

Council has carefully considered whether the proposed requirements should be mandatory or discretionary. It supports the provision of deep soil planting on a minimum of 10% of each of Strategic Development Sites (SDS). There is currently no definition of deep soil within the Maroondah Planning Scheme, and provision of a mandatory requirements without such a definition is considered problematic. This could be addressed through the inclusion of a definition of deep soil within the glossary to the document or in the Planning Scheme provision. It is also suggested that guidance be included in relation to the width of deep soil areas to ensure that it is suited to a range of tree sizes. Council is particularly concerned to ensure that deep soil planting areas include the provision for large trees. Use of tables, similar to those contained in Clause 58.03-5 within either the Masterplan or the Maroondah Planning Scheme would be beneficial.

2.1.2. Overshadowing

The areas of deep soil planting required will not practically be able to be provided along the northern boundary alone of each SDS. Land will also need to be set aside either within the sites or along other boundaries. This has significant implications for the practicality of ensuring that the areas do not experience shade from within the site between 11am and 2pm on 22 September. Council also notes that the requirement to prevent shading does not apply to surrounding land, meaning that the areas may be overshadowed from outside the site.

It is also noted that whilst a minimum of 10% of each SDS is to be provided for deep soil planting the amount of deep soil provided may exceed this. As worded at present any additional space provided would also need to be provided with sunlight access. This is not considered to be practical, and details of which areas are to be designated as deep soil planting and which are other landscaping (whether deep soil or not) should form part of any Strategic Development Plan submitted for each SDS.

As a result, Council seeks an approach where:

- A proportion of the deep soil area must be unshaded, with the remainder able to be shaded to the extent of the specified podium. A figure of half of the designated area (i.e. 5% of the site) is used below, however Council would like to discuss this matter further once modelling has been conducted or it is provided with modelling prepared previously.
- An additional interface type is added to section 5.2.2, detailing that development adjacent to deep soil areas on Strategic Development Sites is to be designed to meet the provisions of Section 7.1.6. This would ensure that sunlight access to these areas is not diminished by development on surrounding land.

2.2. Suggested modifications to improve clarity

Council's review indicates that many of the changes made to the Draft Masterplan 2024 during VPA community engagement align with its own comments on improving readability and accessibility of the document. Some additional opportunities to improve readability have also been identified during the engagement process. Additional suggested changes are as follows:

Location	Draft Masterplan 2024 text	Suggested text
7.1.4	Deep soil requirements Strategic Development Sites must provide a minimum 10 per cent of their site for deep soil, to ensure planting of large canopy trees, at the ground floor level to maximise the benefit to the public realm. Deep soil areas provided to Strategic Development Sites must meet the overshadowing requirements in Section 7.1.6.	Deep soil requirements A minimum of 10 per cent of each Strategic Development Site must be provided as deep soil for the planting of large canopy trees at ground level. The areas provided must have minimum dimensions which allow for tree growth and meet the overshadowing requirements contained in Section 7.1.6.

Location	Draft Masterplan 2024 text	Suggested text
7.1.6	Overshadowing Requirements a) Deep soil areas on Strategic Development Sites must not to be overshadowed between 11am and 2pm on 22 September. b) Buildings and works must not cast shadow between 11am and 2pm on 22 September to existing and future open space beyond shadows cast by new street walls/podiums. c) Buildings and works must maintain sun access over the opposite footpath, measured at least 5 metres from the property boundary between 11am and 2pm on 22 September.	Overshadowing Requirements Buildings and works: a) Must not overshadow more than half of the designated deep soil areas on Strategic Development Sites, b) Must not cast shadow to existing and future open space and remaining deep soil areas beyond shadows cast by new street walls/podiums, and c) Must maintain sun access over the opposite footpath, measured at least 5 metres from the property boundary between 11am and 2pm on 22 September.
Table 4	Minimum upper level setback above the street wall/podium height A minimum setback of 5m must apply where greater setbacks above the street wall/podium height are not required to meet: <ul style="list-style-type: none"> the building separation controls specified in section 7.1.3 or the overshadowing requirements specified in section 7.1.6. 	Minimum setback above the street wall/podium Above the street wall/podium building setbacks: <ul style="list-style-type: none"> Should meet the building separation controls specified in section 7.1.3. Must ensure the building meets the overshadowing requirements contained in section 7.1.6. Must be a minimum of 5m.

2.3. Consistent street wall height to Maroondah Highway

In addition, it is noted that Figure 25 of the Draft Masterplan 2024 includes a yellow wedge on the north-eastern corner of the Western Gateway site, with a note that a preferred podium height of 5 storeys applies within 30m of the intersection. It is noted that a preferred podium height of 6 storeys applies to the remainder of Maroondah Highway in this location. Council's preference is for this 'wedge' to be removed from the plan and from Table 5 to enable a consistent street wall along Maroondah Highway with design flexibility at the corner. If it is to remain, the table should be updated to indicate the area referred to as the north-eastern (rather than north-western) corner.

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.

There is also no information about infrastructure provision, other than noting that “a new simplified approach to infrastructure contributions” will be developed to “contribute to the funding of community infrastructure, open space, walking, cycling and transport infrastructure”³. The timing on the development of this new approach is unclear and it is unknown whether Council will be further consulted on the approach and content of any infrastructure contribution plan.

Providing the ordinance as part of the consultation would allow Council to consider and understand how the new controls will work. Council is concerned that the overlay will simply be a catch-all that will be applied over the top of the existing controls without proper consideration of impacts and outcomes on existing zones and overlays. Whilst Council understands this is likely the intention of the overlay, it is disappointing that such a cookie cutter approach is being taken, with no consideration for the differences between activity centres. The tight timeframe placed on this process is unrealistic and has not been sufficient to allow the thorough assessment and consideration that is required for a change as significant as this.

³ Draft Ringwood Activity Centre Plan August 2024, Section 1, page 5

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.

⁴ Ringwood Activity Centre Program Community Consultation Phase 1 Engagement Summary Report August 2024, page 15

⁵ Ringwood Activity Centre Program Community Consultation Phase 1 Engagement Summary Report August 2024, page 10

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.

5. The proposed ‘walkable’ catchment

5.1. Housing capacity and growth

The facilitation of a pleasant, efficient and safe working, living and recreational environment is a core objective of the Victorian planning system⁶. As Melbourne’s population grows additional housing will be required to accommodate this increase. Larger activity centres and the areas around them are key locations where increased dwelling densities should be investigated. However this cannot be at the expense of considering whether the housing created will in fact be pleasant, efficient and safe, or meet other objectives such as the protection of natural and man-made resources, genetic diversity, and the conservation and enhancement of certain areas⁷. It is critical to consider aspects such as slope, barriers to access, environmental and heritage constraints etc in planning for future growth. A uniform approach to activity centres and their catchments is not appropriate.

There were 46,940 dwellings in Maroondah in 2021. The *Victoria in Future 2023* forecast indicates that this will grow to 55,570 by 2036⁸. This represents an increase of 8,630 dwellings or 18%. In June 2024 the Victorian State Government announced a draft target of a further 36,430 dwellings (giving a total of 44,000 dwellings across Maroondah). To date the modelling on which this estimate has not been provided, however Council’s own estimates indicates that these dwellings can be accommodated within the municipality, subject to strategic planning work which provides for an increase in dwellings in appropriate locations, with lower levels of change in areas of environmental, scenic and heritage significance and further from services. This was outlined in further detail in Council’s 2024 submission to Plan for Victoria.

5.1.1. Dwelling targets

The *Draft Ringwood Activity Centre Plan August 2024* (Draft Plan) indicates that a total of 8,200-12,200 dwellings are to be accommodated within the Ringwood MAC and its hinterland by 2051⁹. The Draft Plan does not outline how many of these dwellings would be provided within the Centre and how many within the hinterland. The hinterland is intended to represent a walkable catchment of 800m from the non-residential areas of the activity centre¹⁰.

⁶ Section 4 of the *Planning and Environment Act 1987*

⁷ Section 4 of the *Planning and Environment Act 1987*

⁸ [Victoria in Future \(planning.vic.gov.au\)](https://planning.vic.gov.au)

⁹ *Draft Ringwood Activity Centre Plan*, page 15

¹⁰ *Draft Ringwood Activity Centre Plan*, page 10

5.1.2. Housing capacity within the ACZ1

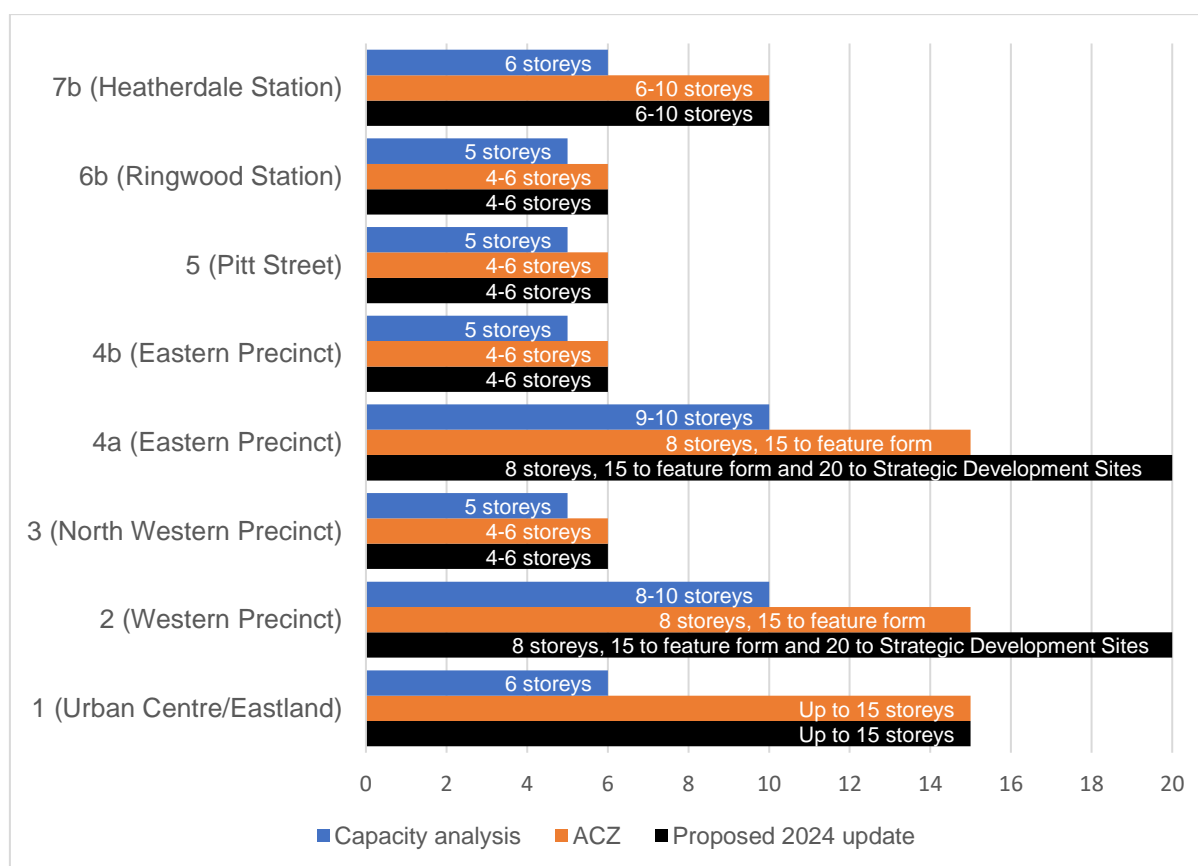
The *Ringwood MAC Capacity Analysis* (SGS Economics and Planning, 2018) indicates a housing capacity of 10,590 to 14,890 dwellings within the Ringwood Metropolitan Activity Centre. This estimate is based on heights outlined in the *Ringwood Metropolitan Activity Centre Masterplan 2018*. The Masterplan was implemented with some modification by Amendment C130maro, which applied the Activity Centre Zone Schedule 1 (ACZ1) to the Centre.

Precincts 3 and 5 of the ACZ1 have a residential focus, while non-residential uses in Precincts 4 and 6 must abut, or have access to, land in a Transport Zone 2 or 3. The impact is that sections of these precincts also have a residential focus.

The ACZ1 allows for an increase in the capacity outlined within the *Ringwood MAC Capacity Analysis* by allowing greater heights than it envisaged in Precincts 1, 2, 4a and 7b as shown in the graph below.

Council is supportive of the extent of built form envisaged for the three strategic development sites detailed in the 2024 draft revisions to the Masterplan. These sites, which are located in Precincts 2 and 4a, are proposed to incorporate tower heights of up to 20 storeys on large sites, further increasing the dwelling capacity of the Centre.

Council's calculations indicate that the changes will increase the residential capacity of the centre to the order of an additional 18,000 dwellings. The diagram below provides further evidence.



Height comparison between capacity analysis, the ACZ1 for Ringwood and proposed modifications to it

On this basis, Council considers that the targeted 8,200-12,200 dwellings within the Ringwood MAC and its catchment can be accommodated within the current ACZ1 extent.

5.1.3. Capacity within the Ringwood Greening the Greyfields Precinct

Council also carried out capacity work in association with its award-winning Greening the Greyfields (GtG) project. The Ringwood Greyfield Renewal Precinct is located to the north of the Ringwood MAC, and the whole area is included in the hinterland map shown within the Draft Plan. The project was implemented through planning policy and the application of the General Residential Zone Schedule 3, Development Plan Overlay Schedule 7 and Development Contributions Plan Overlay Schedule 2. The provisions include indicative dwelling densities which are dependent on site area, with an underlying principle being that this will encourage the consolidation of lots. Dwelling heights of up to 13.5m and densities of up to 180 dwellings per hectare are anticipated, with the most significant housing change anticipated in the south-western corner. It is anticipated that this will result in an additional 210 dwellings in that precinct by 2035, an increase of 72%¹¹. Conservatively, a doubling of housing in the precinct by 2051 would yield 290 dwellings. The greatest increase in dwelling yield is anticipated in Sub-Precinct C, which is located closest to the Ringwood MAC. Development in this area can currently extend to four storeys in height, whilst double and triple storey development is anticipated further north.

5.2. Public transport access

The Ringwood Railway Station is located at the core of the Ringwood MAC, whilst the Heatherdale Railway Station has recently been relocated to its western edge. In 2022/23 Ringwood ranked No. 15 across Melbourne's 223 train stations in terms of annual patron numbers. On average 4,150 patrons tap on or off at the station on weekdays, 3,100 on Saturdays and 2,300 on Sundays.

In addition, the station serves as a bus interchange, with nine bus routes providing linkages to the station. Bus stops are also located on arterial roads within the MAC. Public transport is not uniformly provided through the centre and its catchment however, and whilst the Principal Public Transport Network extends to the area between the two train stations and south along Wantirna Road, the quality of bus services provided to the north, east and west means that these areas, including much of the indicated 'walkable catchment' is not well serviced by public transport.

5.3. Mapping a walkable catchment

Council has considered the catchment indicated in the *Draft Ringwood Activity Centre Plan August 2024* and has identified that:

- The catchment depicted in the Draft Plan includes areas that are in proximity to the centre as a whole, rather than the non-residential precincts.
- Much of the eastern portion of Precinct 4 is taken up with Ringwood Lake and a multi-level aged care facility currently under construction at 2A Mt Dandenong Road and 174 Maroondah Highway (i.e. is to be residential in focus).
- It is appropriate that safe access be provided during the evening as well as during the day. As a result access has been measured along roads, rather than through parkland or creek trails.
- Some areas shown as being part of the catchment are 1,400m or more from commercial or retail land within the ACZ1.
- Mapping does not include consideration of the significant barriers to walkability presented by EastLink, the built form of Eastland, major transmission lines and the slope of surrounding land. Much of the hinterland and access to the MAC exceeds a slope of 4%, with many areas not being accessible by wheelchair as they have a slope of 7.1%. This reduces the 'walkability' of sections of the mapped catchment for those with mobility issues (including, but not only, those in wheelchairs) or those using prams or shopping carts.
- The catchment depicted extends to include parts of the walkable catchment of the Ringwood East Neighbourhood Activity Centre.

¹¹ *Ringwood Greyfield Precinct Development Contributions Plan*, August 2021, page 11

- An extension of the catchment to the south to Reilly Street (a distance of 1,100m from the ACZ1), in recognition of bus services available along Wantirna Road, is appropriate.



Access to the Mullum Mullum Creek Trail, eastbound from Warrandyte Road (source: J Bernoth, 20 September 2024)



Gateway to Ringwood MAC from Warrandyte Road, to the north (source: J Bernoth, 20 September 2024)



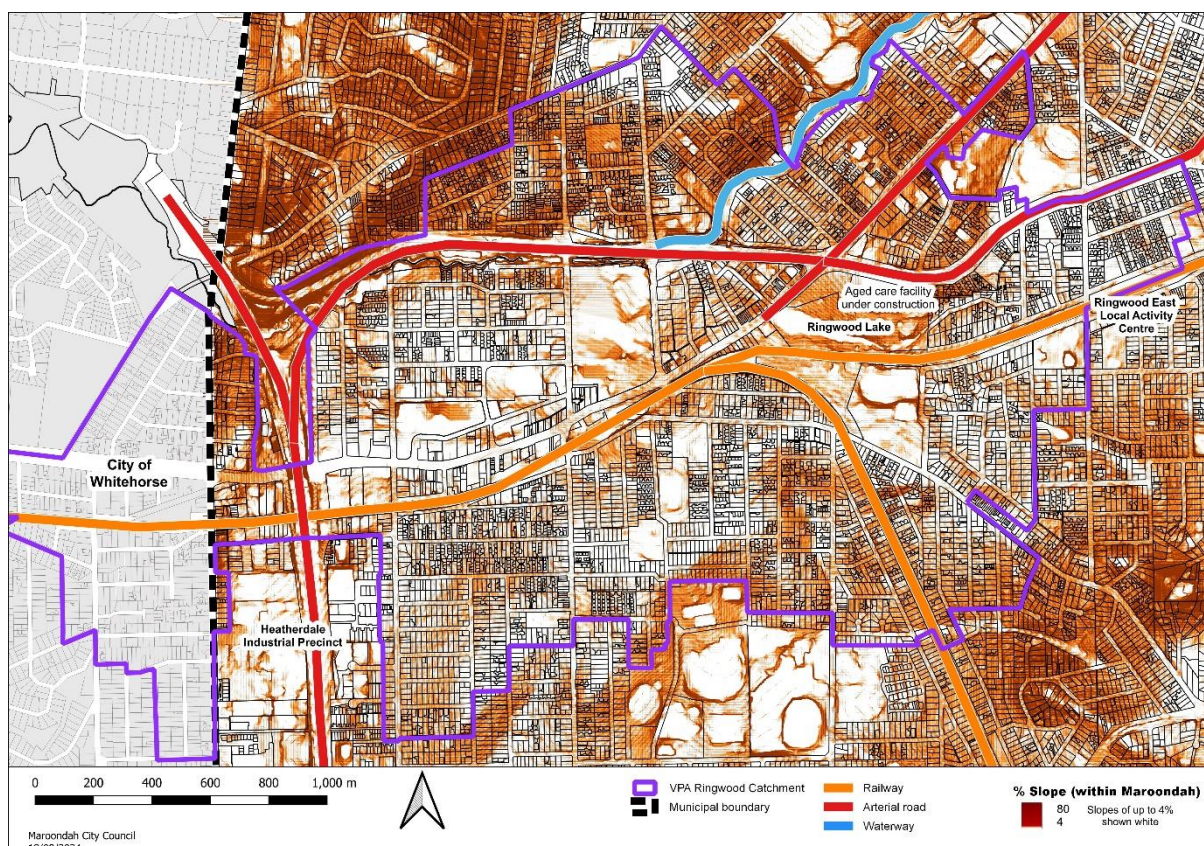
Presentation of Eastland to Warrandyte Road (source: J Bernoth, 20 September 2024)



Gateway to Ringwood MAC from Ringwood Street, to the north (source: J Bernoth, 20 September 2024)



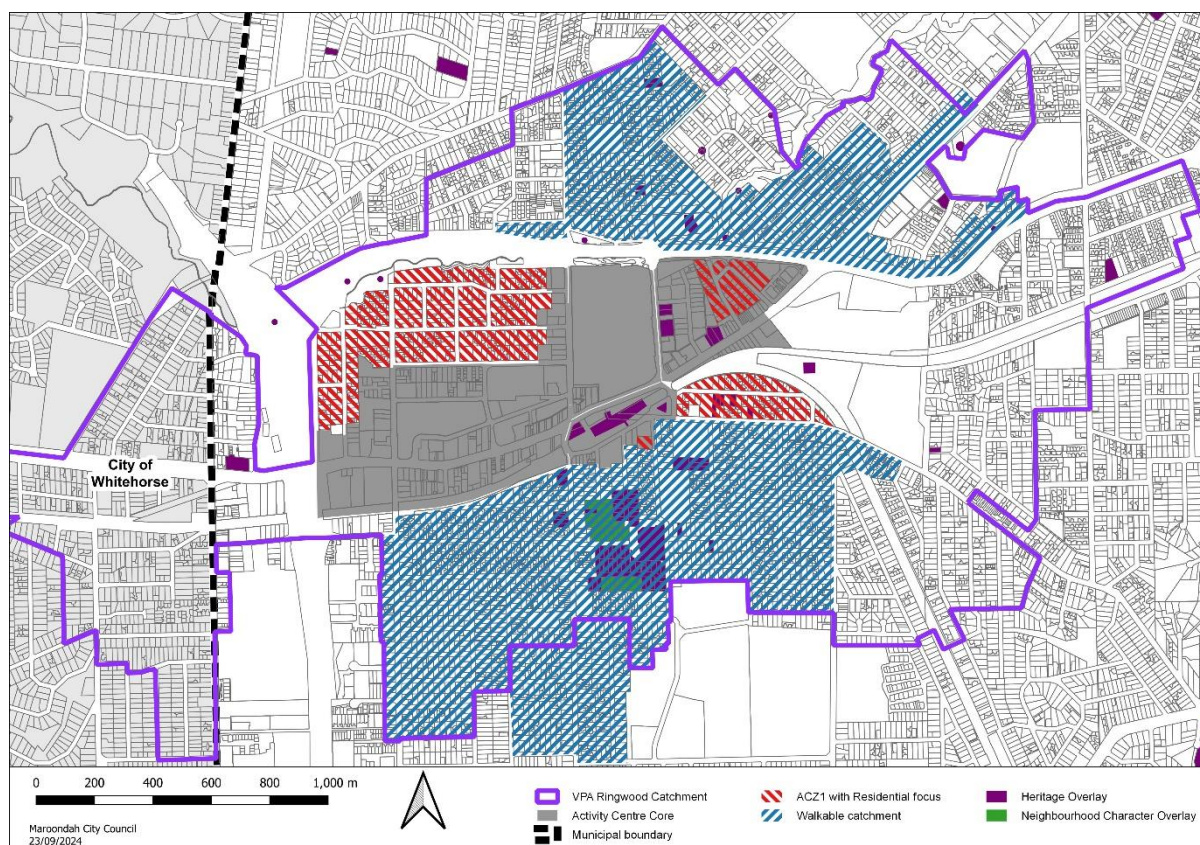
Warrandyte Road, looking south toward Eastland. The road falls by 29m to Ringwood Bypass, rising again by 10m to Maroondah Highway (source: J Bernoth, 18 September 2024)



Barriers to access to the Ringwood MAC from its hinterland

Barriers to access to the MAC from the surrounding area are depicted above.

Council's view is that a more appropriate walkable catchment, within its own municipality, is as shown in map below¹².



Key housing opportunities within the ACZ1 and a walkable catchment

Assuming that housing within the walkable catchment is doubled over time, and that the additional height outlined for the Strategic Development Sites is taken up with dwellings in a series of towers on each site, the capacity of the centre and its walkable catchment would be approximately 20,500 additional dwellings.

Increased development is expected within walking distance to the Activity Centre core, adding further to this capacity. **It is considered that modifications to planning controls within the walkable catchment to allow heights beyond four storeys, and changes to planning controls in areas not highlighted above, are not required to achieve the dwelling targets required by 2051.**

¹² No assessment of an appropriate catchment extent within the City of Whitehorse has been conducted by the Maroondah City Council, however it is noted that all land within the City of Whitehorse is located to the west of EastLink.

6. Impacts on Ringwood Metropolitan Activity Centre

Section 4 of the *Planning and Environment Act 1987* sets out the objectives for planning in Victoria, which include securing a pleasant, efficient and safe working, living and recreational environment for all Victorian and visitors to Victoria.

Plan Melbourne notes that plans for metropolitan activity centres will need to accommodate significant growth and infrastructure, while increasing amenity and connectivity for a regional catchment¹³.

Direction 2.1 of *Plan Melbourne* seeks to manage the supply of new housing in the right locations to meet population growth and create a sustainable city.

State policy at Clause 11.03-1 (Activity Centres) seeks to encourage major retail, residential, commercial, administrative, entertainment and cultural developments into activity centres that are highly accessible to the community.

This includes providing employment uses as well a diversity of housing including higher density. Active transport and public transport access within activity centres is sought to be improved.

Clause 11.03-1 also requires that strategic planning for the use and development of land in and around activity centres give clear direction on investment, as well as encouraging a diversity of housing types at higher densities in and around activity centres.

Since 1987 Ringwood has been identified as a key commercial, retail, employment and residential location with the introduction of the *Ringwood District Centre Structure Plan* (to 2001 and beyond), followed by the *Ringwood Transit City Urban Design Masterplan 2004* and the *Ringwood Metropolitan Activity Centre Masterplan* (the Masterplan) in 2018. The 2018 Masterplan has been implemented in the Maroondah Planning Scheme via Amendment C130maro which also introduced the ACZ1 over the extent of the area covered in the Masterplan.

The Masterplan seeks to reinforce Ringwood Metropolitan Activity Centre (MAC) as the principal retail, commercial, community, entertainment and employment focal point for the region. The extent of the Masterplan area goes beyond the core commercial and retail centre of Ringwood to include surrounding areas where increased residential densities are supported.

The 2004 Masterplan recognised Ringwood's potential for growth, and there has been significant investment in the centre since this time, both private and public since, including the redevelopment and expansion of Eastland, Ringwood Train Station and Bus Interchange upgrade, development of Realm and the Maroondah City Council Offices, the construction of Costco, the Sebel and Sage Hotels and the VicRoads/DTP office on Maroondah Highway.

A number of multistorey residential buildings have been constructed within the Masterplan area, including some up to seven storeys.

¹³ *Plan Melbourne 2017-2050*, Policy 1.2.1, page 36



Existing multi level apartments at 42 Nelson Street, Ringwood (Source: A. Ransom, 20 September 2024)

Council is concerned that the proposed catchment area as identified in the *Draft Ringwood Activity Centre Plan* will undermine the intent of the Masterplan which seeks to encourage a mix of housing typologies for residential development within the MAC.

Dwellings are permitted in all of the Precincts identified in the Masterplan, with the exception of Precinct 7A. Precincts 3 and 5 are identified for residential infill with preferred heights between 4 storeys and 6 storeys. Precinct 4, whilst allowing commercial uses, requires that these much have access to a road in a Transport Zone 2 or 3, and so sites without this access will likely be developed for residential uses.

Council considers that that there is sufficient capacity to deliver the dwelling targets set out on page 7 of the *Draft Ringwood Activity Centre Plan* August 2024, within the existing MAC as discussed in further detail under Section 5.1.2 - Housing capacity within the ACZ1.

7. Planning for the Ringwood East Neighbourhood Activity Centre

7.1. Planning for centres

The objective of Clause 11.03-1S of the Victoria Planning Provisions is to “encourage the concentration of major retail, residential, commercial, administrative, entertainment and cultural developments into activity centres that are highly accessible to the community”. Strategies to achieve this objective encourage the development of a network of activity centres that will comprise a range of centres that differ in size and function.

7.2. Maroondah’s activity centre hierarchy

Council has prepared a hierarchy of activity centres, as detailed in the Maroondah Planning Scheme and further refined in its 2024 Planning Scheme Review. These detail that the Ringwood Metropolitan Activity Centre is the largest activity centre within the municipality, followed by the Croydon Major Activity Centre. Together these centres are the focal point of commercial and retail activity within the municipality. More local needs are met by Neighbourhood Activity Centres at Ringwood East and Heathmont, with smaller centres elsewhere also providing for the daily needs of residents.

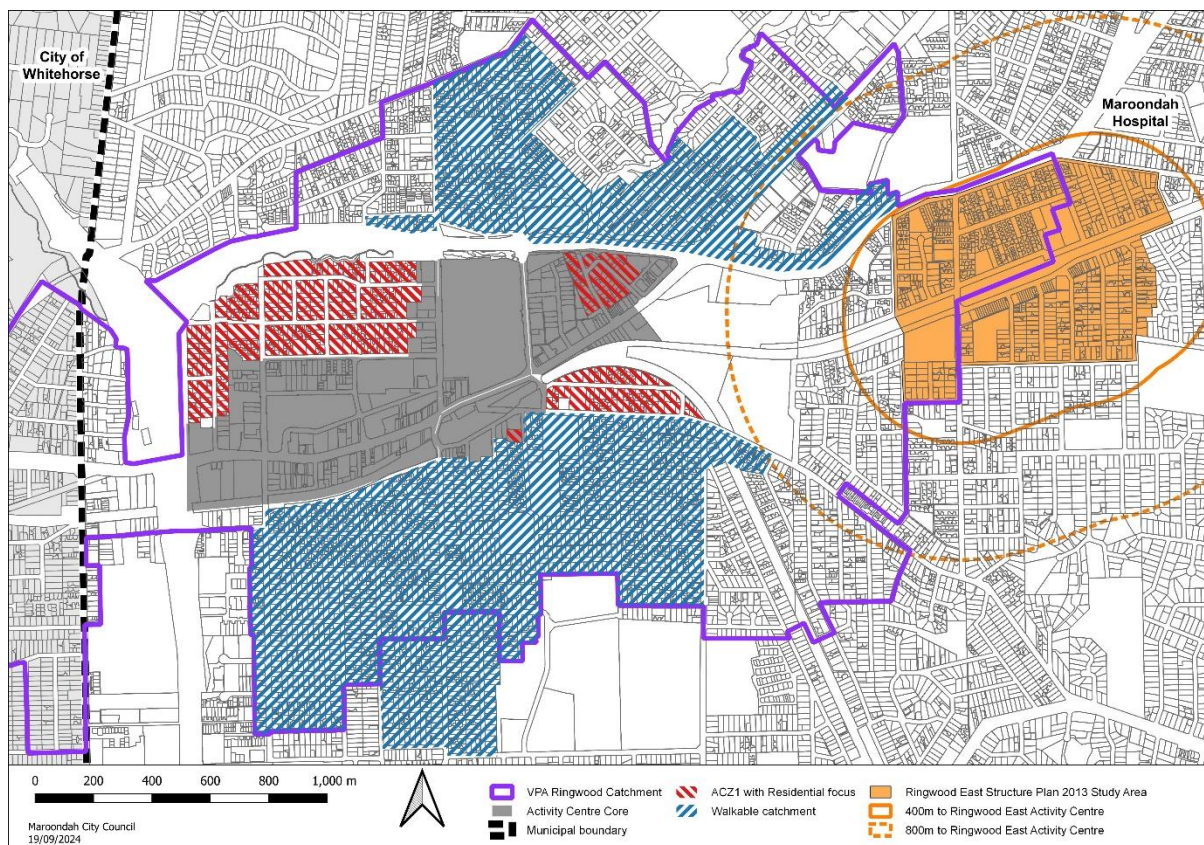
7.3. Ringwood East Structure Plan

Council adopted the Ringwood East Structure Plan in August 2013. The Plan covers both the commercial core and the residential hinterland of the Centre. Council has identified the need to conduct a review of the Plan in the coming two years (i.e. prior to the next planning scheme review) based on a need to consider the role of the centre within the hierarchy, the need for additional housing within both the centre and its hinterland, and the impact of the draft housing targets.

Plan Melbourne outlines that “Local plans undertaken in consultation with the community will identify the scope and nature of future growth within each activity centre”¹⁴. It also identifies the importance of Neighbourhood Activity Centres in the development of 20-minute neighbourhoods and a sense of community.

As detailed in Planning Practice Note 58, it is appropriate that the review includes work to identify and plan for the future of the centre and its residential catchment. Inclusion of approximately half of the Ringwood East Structure Plan area within the proposed Ringwood Metropolitan Activity Centre catchment will hinder future planning for Ringwood East by removing Council’s ability to articulate a single vision for that centre. It is anticipated that in reviewing the extent of the Plan’s area Council would consider land within approximately 400m and 800m of the Centre in the first instance. As shown in the figure below this includes land which has more convenient access to Ringwood East NAC than to the commercial areas of Ringwood MAC, despite currently being shown as within the Ringwood MAC catchment.

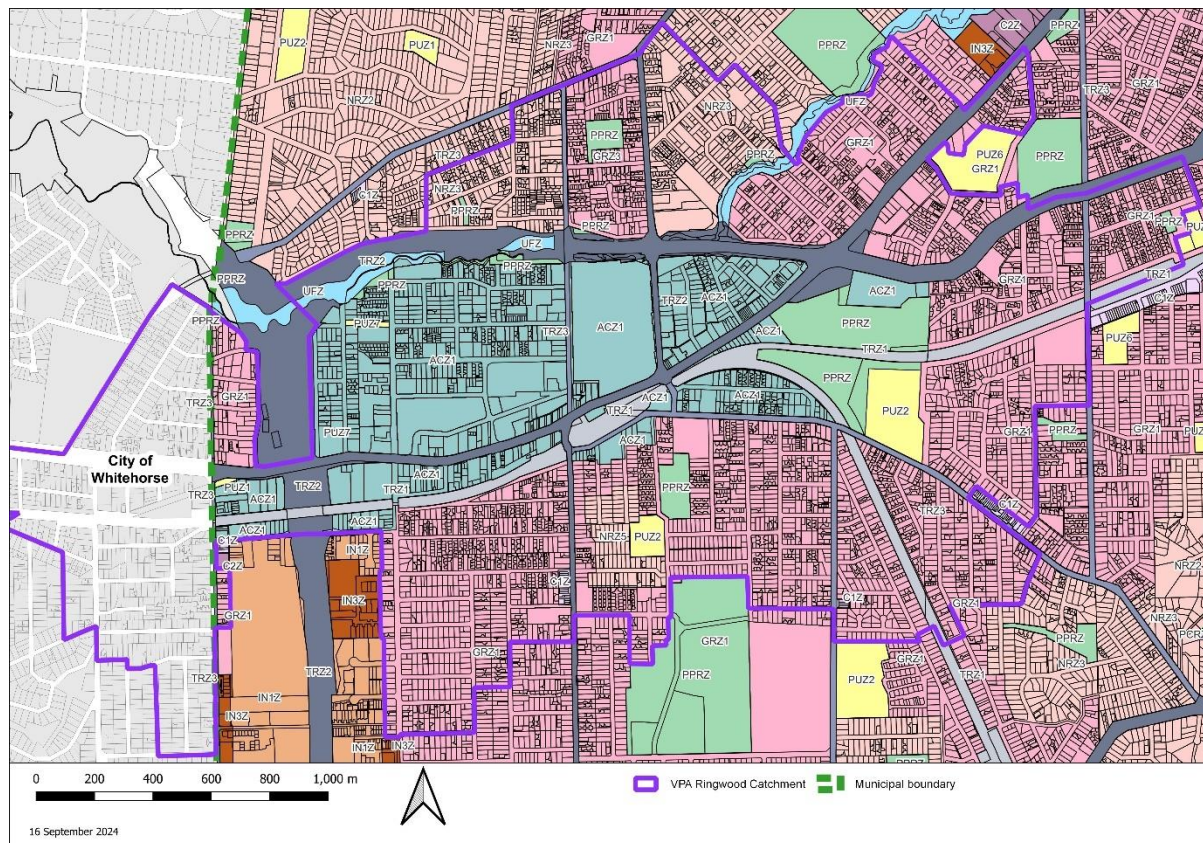
¹⁴ *Plan Melbourne*, page 37



Relationship between the catchments of Ringwood MAC and Ringwood East NAC

Redefining the Ringwood MAC catchment as depicted above would address this issue and allow future planning for the Ringwood East NAC to be effective.

8. Existing residential zones



Current zoning of Ringwood MAC and its surrounds within Maroondah

The *Planning and Environment Act 1987* sets out several objectives for planning in Victoria, of which the following are relevant when considering how and where residential development should occur:

- (a) To provide for the fair, orderly, economic and sustainable use, and development of land;
- (b) To provide for the protection of natural and man-made resources and the maintenance of ecological processes and genetic diversity
- (c) To secure a pleasant, efficient and safe working, living and recreational environment for all Victorians and visitors to Victoria.

Policy 2.1.4 of *Plan Melbourne* is “Provide certainty about the scale of growth in the suburbs”¹⁵. The policy notes that local government and the community need to have confidence that the built form objectives they sign up to will be adhered to.

New residential zones were introduced into the Victorian Planning Provisions in 2013 to indicate what level of growth could be expected in residential areas. Maroondah has applied the Neighbourhood and General Residential Zones to most residential areas, noting that the Residential Growth Zone was used for residential areas identified in the Ringwood Masterplan, prior to the introduction of the ACZ1.

Clause 16.01-1S (Housing supply) in the Planning Policy Framework of the Maroondah Planning Scheme, seeks to facilitate well-located, integrated and diverse housing that meets community needs.

¹⁵ *Plan Melbourne 2017-2050*, Policy 2.1.4, page 49

The strategies to achieve this objective, seek to ensure that a diverse range of housing is provided such as aged care, supported accommodation for people with disability, rooming houses, student accommodation and social housing. Higher density housing is encouraged in locations with good access to jobs, services and public transport.

Clause 16.01-1R recognises that housing should be located in:

- Areas for residential growth
- Areas for greyfield renewal, particularly through opportunities for land consolidation
- Metropolitan activity centres and major activity centres.

The Municipal Planning Strategy at Clause 02.01 of the Maroondah Planning Scheme recognises that there are numerous parts of the municipality that possess special environmental and landscape characteristics including the two ridgelines, Wicklow Hills Ridge and the Loughnan-Warranwood Ridge, the later which is located to the north of the Ringwood MAC.

The application of the residential zones has occurred in recognition of these special characteristics. The explanatory report for Amendment C93maro which applied the new residential zones, recognised that the two ridgelines physically dominate the municipality as well as having unique flora and fauna characteristics.

The following zones apply within the catchment:

- Neighbourhood Residential Zone Schedule 2 - Ridgeline Protection Area B
- Neighbourhood Residential Zone Schedule 3 - Canopy Cover Ridgeline Protection
- Neighbourhood Residential Zone Schedule 5 - Jubilee Park
- General Residential Zone Schedule 1 - General Residential Areas.

The zoning of land around the Ringwood MAC recognises the environmental, character and accessibility constraints. Neighbourhood Residential zoned land covers approximately 44 percent of the residential land in Maroondah. The General Residential Zone is approximately 56 percent of land in Maroondah.

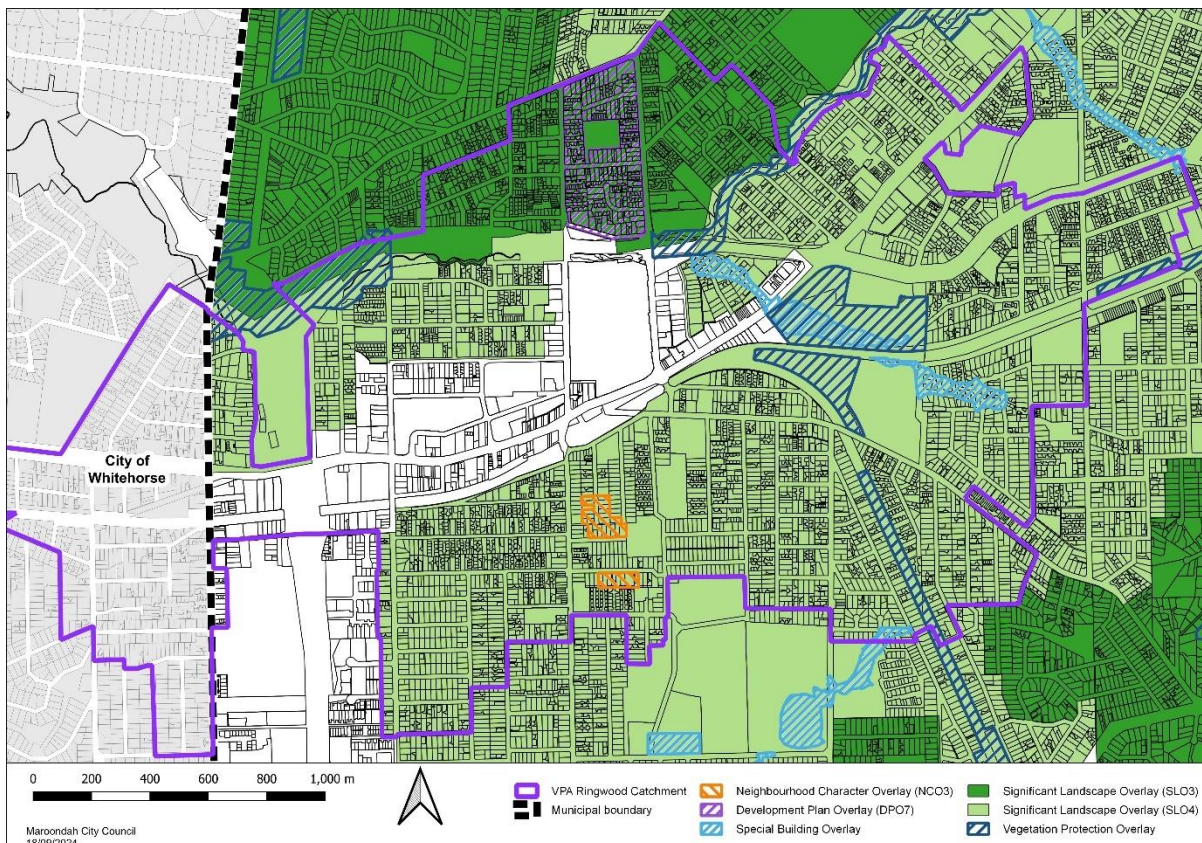
The proposed catchment has no regard to the zoning or the strategic justification behind it. The new catchment controls will treat all areas within the catchment the same and do not recognise the differences in areas around the Ringwood MAC. The General and Neighbourhood Residential Zones have deliberately been applied through detailed strategic planning process which have included community consultation and panel hearings.

The existing land within the catchment that is zoned General Residential already provides the opportunity for a range of housing types and densities.

Within the proposed catchment, the NRZ3 applies to the area to which the SLO3 also applies, recognising the importance of the objectives of this overlay as outlined below in Sections 9.2 and 9.3 and providing consistent controls. It is also noted that these areas generally have sloping topography, and high levels of vegetation coverage as discussed throughout this submission.

The catchment should not extend into areas that are recognised to have environmental significance as it is considered that they are unsuitable for development and are highly valued by the community for their vegetation and character.

9. Existing Overlays



Selected Planning Scheme Overlays surrounding Ringwood MAC¹⁶

The *Planning and Environment Act 1987* objectives recognise the need to provide for the protection of natural and man-made resources and the maintenance of ecological processes and biodiversity, and to conserve and enhance those buildings, areas or other places which are of scientific, aesthetic, architectural or historical interest or otherwise of special cultural value.

Policy 4.1.1 of *Plan Melbourne* recognises that there are “a mosaic of diverse natural landscapes and urban places” which contribute to Melbourne’s distinctiveness¹⁷.

Clause 15.1.1S (Urban design) aims to create urban environments that are safe, healthy, functional and enjoyable and that contribute to a sense of place and cultural identity. Relevant strategies include to require development to respond to its context in terms of character, cultural identity, natural features, surrounding landscape and climate.

Clause 15.01-S (Neighbourhood character) is to recognise, support and protect neighbourhood character, cultural identity and sense of place. This includes responding to the underlying natural landscape character and significant vegetation and neighbourhood character values and built form that reflect community identity.

Local policy at 15.05-5L supports maintaining and enhancing canopy vegetation in Maroondah, and ensuring that residential development complements the environmental character of Maroondah.

¹⁶ Some additional properties within the VPA catchment are also affected by the Heritage, Development Contributions Plan and Development Plan Overlays. Their controls are not relevant to the discussion below and as a result have been omitted from the map for clarity. Similarly, while other overlays apply to land outside the catchment these are omitted for clarity.

¹⁷ *Plan Melbourne 2017-2050* Policy 4.1.1, page 81

Under Section 4 (Implementation) of the *Draft Ringwood Activity Centre Plan August 2024*, it is noted that the “preferred planning tool for the catchments is to be confirmed. It is not proposed to remove the heritage overlays through new provisions”¹⁸

Under Section 4.3.1, it is noted that the following planning controls are proposed to be retained in the activity centre:

- All heritage protection (HO)
- Special Building Overlay (SBO)
- Vegetation Protection Overlays (VPO1)
- Development Contributions Plan Overlay (DCPO1)
- Development Plan Overlay (DPO2)

Although the wording is unclear, it appears that this means that any existing overlays in the catchment area are to be removed or made redundant.

If this is the case, Council is disappointed that a more considered approach has not been taken. Council does not support the removal of the overlays as discussed in detail below.

9.1. Vegetation Protection Overlay Schedule 1 (VPO1) – Sites of Biological Significance

The VPO1 applies to sites of biological significance across Maroondah and seeks to protect remnant indigenous vegetation.

VPO1 acknowledged that remnant vegetation communities are only 3 percent of the municipality and that this vegetation is significant for its biodiversity, habitat and floristic values. The retention and enhancement of the remnant vegetation is critical to maintaining and increasing biological diversity in Maroondah. Remnant vegetation provides the basis for the development of wildlife corridors for native flora and fauna.

Objectives to protect vegetation include ensuring biodiversity is maintained, indigenous flora and fauna is increased and remains visible.

The overlay applies to several sites in the MAC and catchment area, including Mullum Mullum Creek, Ringwood Lake Park, Bedford Park and the Belgrave trainline south of Bedford Road. The VPO1 generally applies to public land but does to a small number of private properties in the catchment that are located adjacent to the Mullum Mullum creek. It is considered that this overlay can be retained as it will have minimal impact on the development capacity of the catchment.

9.2. Significant Landscape Overlay 3 - Wicklow Hills Ridge and Loughnan Warranwood Ridge Landscape Protection Area

This overlay notes that canopy trees are the main element of the urban character of Maroondah, and that the continuous nature of the canopy vegetation through our the ridgelines of Maroondah provides a strong character element and is much valued by the community. The contiguous vegetation contributes to the maintenance of biodiversity through the provision of wildlife movement corridors, habitat and shelter areas.

SLO3 applies to areas north of the Ringwood MAC, over the Loughnan-Warranwood ridgeline. The overlay seeks to protect the vegetation along the ridgeline for both its contribution to biodiversity as well as character. The overlay also requires consideration of the impacts on buildings on the ridgeline, and that vegetation remains the dominant element. The impact of this overlay is evident in the type of development that has occurred on the Loughnan-Warranwood ridgeline.

¹⁸ *Draft Ringwood Activity Centre Plan August 2024*, Section 4, page 14, paragraph 2

The SLO3 has been in place in the Maroondah Planning Scheme since the introduction of the New Format Planning Scheme in December 1999 where it was introduced as SLO1, and was replaced by SLO3 29 July 2004, with the same content¹⁹. It is likely that the level of canopy coverage in Maroondah is due to the SLO3 being in place for a number of years to protect vegetation.

As noted previously, vegetation is highly valued by the community and the removal or weakening of the SLO3 would undermine the strategic controls and clear direction provided to the community on how development should occur in this area.

9.3. Significant Landscape Overlay Schedule 4 (SLO4) - Landscape canopy protection.

The combination of the canopy trees and steep to undulating topography are major elements that contribute to the urban character in this area that is protected by the SLO4. The existing pattern of vegetation, maintenance of a dense canopy cover, and the regeneration of vegetation are all landscape character objectives to be achieved.

Similar to SLO3, vegetation is valued for its landscape contribution as well its role in maintaining biodiversity. This overlay has also been in place since the introduction of the New Format Planning Scheme in December 1999. It was SLO2 until being replaced with SLO4 in 2004, with the same content²⁰.

This overlay exists within the Ringwood MAC and to the south, east and north of the MAC. Development in the Ringwood MAC has occurred in accordance with the Masterplan and some large trees feature as part of development, adding to the landscape character of the area. This is demonstrated in the photos below.



Apartments at 42 Nelson Street, Ringwood (Source: A. Ransom, 20 September 2024)

¹⁹ As part of Amendment C034 to the Maroondah Planning Scheme

²⁰ As part of Amendment C034 to the Maroondah Planning Scheme.



Apartments at 1 Nelson Street, Ringwood (Source: A. Ransom, 20 September 2024)



Interface between existing apartments and vegetation, Ringwood (source: A. Ransom, 20 September 2024)

9.4. Neighbourhood Character Overlay Schedule 3 (NCO3) - Jubilee Park

This overlay protects a small area south of the Ringwood MAC that is recognised as being significant as a rare example of a neighbourhood that includes development from the inter war period, with the only other comparative example being two other areas in Croydon, as shown in the photos below.



4 Ellison Street, Ringwood (source: G. Meyer, 15 August 2019)



16 Ellison Street, Ringwood (source: G. Meyer, 15 August 2019)



James Street Ringwood, looking north (source: G. Meyer, 15 August 2019)

The area is notable for the consistency in low scale, older dwellings predominately constructed from timber with tiled, pitched or gable roofs. The regularity of built form and setbacks creates an orderliness within the character area.

The Jubilee Park area is a small pocket of 21 properties to the south of the Ringwood MAC.

The NCO3 was applied through Amendment C116maro to the Maroondah Planning Scheme in 2020 following a rigorous strategic planning process including extensive community consultation, which was undertaken prior to the amendment as well as during the amendment process. As part of the amendment three precinct wide heritage overlays were also applied (HO 98, HO140 & HO141) and individual heritage overlays (HO142, HO143 & HO145). This approach was not only supported by the community during the strategic planning process but also by the Panel appointed for Amendment C116maro. The panel report noted that the area demonstrates the characteristics of one of the earliest suburban developments in Ringwood associated with the development of the Lilydale line.

The areas' special significance to the municipality was further recognised not only by the introduction of the Heritage Overlay but also by the inclusion of the Neighbourhood Character Overlay as a supporting planning tool recognising the historic character of the area.

Of significance is the justification to the NCO as noted in the Panel report where it was noted that *"the Panel supports the application of the Neighbourhood Character Overlay in the limited extent proposed".* The Panel considered that the use of the NCO *"complements the identified local cultural heritage values in Haig, Ellison and Kendall Streets.* It was indicated that *"there was adequate strategic justification to apply the HO and NCO and that the two planning tools can work in a complimentary fashion."*²¹

The Panel concluded that the use of the NCO has been well-targeted in this instance in order to achieve built form controls over a very limited area. It has been applied judiciously rather than as a 'blanket' approach.

It was further acknowledged that the Jubilee Park represents special circumstances that warrants the careful application of the NCO.

²¹ Maroondah Planning Scheme Amendment C116 Panel Report 24 September 2019, page 8

The NCO3 applied to only 21 properties and in many ways is similar to a Heritage Overlay, noting that some of the surrounding associated properties are protect with a HO. The retention of the NCO3 would have minimal impact on the housing capacity of the catchment and is highly valued by the community and therefore Council strongly maintains that it should be retained.

9.5. Greening the Greyfields (DPO7 and DCP02)

Development Plan Overlay Schedule 7(DPO7) applies to Ringwood Greyfield Renewal Precinct.

This overlay applies to one of two greyfield precincts that existing in Maroondah. The objectives of the DPO7 includes encouraging site consolidation to allow for increased housing density and to enhance residential and landscape character through vegetation planting, provide good pedestrian circulation and to integrate environmentally sustainable design into new development.

Development Contributions Overlay Schedule 2 (DPO2) - Ringwood Greyfield Precinct Development Contributions Plan funds streetscape and environment upgrades required to realise the Ringwood Greyfields Renewal Precinct.

The Ringwood Greyfield precinct was introduced by Amendment C134maro on 18 November 2022. It implemented the Greening the Greyfields concept for precincts in Ringwood and Croydon South. Maroondah worked in partnership with Swinburne University to develop this as a pilot, and the Ringwood precinct was selected due to its location adjoining the Ringwood MAC and the ageing dwelling stock in the precinct.

The Amendment rezoned the land to GRZ3, applied the DPO7 and DCPO2 and made changes to a number of clauses in the Maroondah Planning Scheme to give effect to the zoning and overlay changes.

The Greening the Greyfields project was developed to address adhoc infill development which results in poor development outcomes including poor urban design outcomes, loss of vegetation, and increased hard surfacing. On the flipside, Greening the Greyfields provides a strategic approach to encourage the consolidation of lots to improve housing options, open space and canopy tree coverage, less hard surfacing treatments, and better walking and cycling connections.

The Panel Report for C134maro (which also considered Amendment C136Maro which applied to the Croydon South greyfield area) noted that the *“Amendments deliver on a specific action from Plan Melbourne, namely the coordinated redevelopment of greyfield areas. The Amendments weave in delivery on broader objectives for encouraging higher density outcomes in and around activity centres and providing for a greener and cooler Melbourne”*²².

Worth noting is that the Panel Report states that the Panel *“appreciates there are topographical considerations to inform appropriate height limits along Warrandyte Road”* and therefore accepted 9 metres high limits in some sections of the Ringwood Greyfield Precinct to address this issue²³.

The Amendment supports Direction 2.2.4 of *Plan Melbourne* which is “provide support and guidance for greyfield areas to deliver more housing choice and diversity, and notes that “Greyfield areas provide an ideal opportunity for land consolidaton and need to be supported by a coordinated approach to planning that delivers a greater mix and diversity of housing and provides more choice for people already living in the area as well as for new residents”²⁴.

²² Maroondah Planning Scheme Amendment C134maro and C136maro Panel Report 9 August 2021, page 12

²³ Maroondah Planning Scheme Amendment C134maro and C136maro Panel Report 9 August 2021, page 26

²⁴ *Plan Melbourne 2017-2050* Direction 2.2.4, page 51

Council considers that the Greening the Greyfields precincts in Ringwood and Croydon South are a model for how improved housing outcomes can be delivered across Melbourne and that the overlays to implement it should remain in place. Significant time, resources and budget have been invested into the project, which has won several awards and was also successful in obtaining grant funding, including a grant for \$152,00 from the VPA under the Streamlining for Growth program, which was awarded in January 2021 to assist in progressing the project.

10. Impacts on vegetation and biodiversity

The *Planning and Environment Act 1987*, includes the following objectives relevant to vegetation protection and biodiversity:

- (a) *to provide for the fair, orderly, economic and sustainable use, and development of land*
- (b) *to provide for the protection of natural and man-made resources and the maintenance of ecological processes and genetic diversity and*
- (c) *to secure a pleasant, efficient and safe working, living and recreational environment for all Victorians and visitors to Victoria.*

Direction 6.4 of *Plan Melbourne* is to “Make Melbourne cooler and greener”²⁵. This Direction recognises the urban heat-island effect that is created by the built environment. It states that “*to mitigate the impacts of increased average temperatures Melbourne needs to maintain and enhance its urban forest of trees and vegetation on properties, lining transport corridors, on public lands, and on roofs, facades and walls*”.

Policy 6.4.1 supports “a cooler Melbourne by greening urban areas, buildings, transport corridors and open spaces to create an urban forest” and notes “Residential development provisions must be updated to mitigate against the loss of tree canopy cover and permeable surfaces as a result of urban intensification”²⁶.

Direction 6.5 is “Protect and restore natural habitats” and recognises that “*there is a critical need to maintain and improve the overall extent and condition of natural habitats, including waterways. Natural habitats need to better protect native flora and fauna, enhance the community’s knowledge and acceptance of wildlife in areas they live, enhance access to nature and recreational opportunities across urban areas and make Melbourne an attractive place to live and visit*”²⁷

Policy under this Direction includes:

Policy 6.5.1 - Create a network of green spaces that support biodiversity conservation and opportunities to connect with nature. This policy recognises that Melbourne’s network of green spaces provides important habitat for biodiversity as well as providing access to green spaces for people to experience and enjoy.

Policy 6.5.2 - Protect and enhance the health of urban waterways. The impacts of stormwater run-off from urban areas is recognised in this policy and the need for water sensitive urban design.

Clause 12.01-1S (Biodiversity) is to protect and enhance Victoria’s biodiversity. Strategies to achieve this include:

- *Use biodiversity information to identify important areas of biodiversity, including key habitat for rare or threatened species and communities, and strategically valuable biodiversity sites.*

²⁵ *Plan Melbourne 2017-2050* Direction 6.4, page 116

²⁶ *Plan Melbourne 2017-2050* Policy 6.4.1, page 119

²⁷ *Plan Melbourne 2017-2050* Direction 6.5, page 121

- *Strategically plan for the protection and conservation of Victoria's important areas of biodiversity.*
- *Assist in the identification, protection and management of important areas of biodiversity.*
- *Assist in the establishment, protection and re-establishment of links between important areas of biodiversity, including through a network of green spaces and large-scale native vegetation corridor projects.*
- *Support land use and development that contributes to protecting and enhancing habitat for indigenous plants and animals in urban areas.*

Clause 12.01-2S (Native vegetation management) seeks to ensure that there is no net loss to biodiversity as a result of the removal, destruction or lopping of native vegetation.

Clause 12.03-1S (River and riparian corridors, waterways, lakes, wetlands and billabongs) contains the objective to protect and enhance waterway systems including river and riparian corridors, waterways, lakes, wetlands and billabongs including protecting the environmental, cultural, landscape values of all waterway systems as significant economic, environmental and cultural assets.

Clause 12.05-2S (Landscapes) is to protect and enhance significant landscape and open spaces that contribute to character, identity and sustainable environments. This includes recognising the natural landscape for its aesthetic value and as a fully functioning system, and ensuring important natural features are protected and enhanced.

Clause 12.05-2L (Ridgelines) seeks to minimise the visual impact of development on ridgelines. This is to be achieved through:

- *Develop sites in a manner that does not detract from the visual dominance of vegetation along the ridgelines.*
- *Design buildings that are not highly visible from lower areas.*
- *Avoid the removal of large canopy trees.*
- *Design development that allows adequate space for the retention and planting of large canopy trees.*
- *Encourage revegetation with indigenous species, especially in locations that connect sites of biological significance.*

The Municipal Planning Strategy at Clause 02.01 recognises that the ridgelines and their extensive coverage of natural bushland and large canopy trees play a prominent role in defining the landscape and character significance of the municipality. Near-continuous canopy tree cover, interspersed by rooftops, dominates views to the ridgelines. The hills help define the sense of place and provide views from dwellings and streets that are evident both within and outside the municipality”.

Clause 02.03-2 recognises that retention, protection and enhancement of remnant vegetation is critical as it provides habitat for flora and fauna and contributes to biological diversity across the municipality.

This clause also recognises:

- The extensive coverage of indigenous vegetation in the elevated parts of Maroondah plays a prominent role in defining the landscape and character significance of the municipality.
- Waterways, wetlands and floodplains provide important habitat in Maroondah.
- The need to protect and improve identified sites of biological significance and strategically important areas for expanding and connecting these sites, such as wetlands, waterways, floodplains and ridgelines.

10.1. Other relevant policy

Outside of the planning scheme, Maroondah has undertaken significant strategic work to protect and enhance vegetation and biodiversity across the municipality.

10.2. Maroondah Vegetation Strategy 2020-2030²⁸

The Maroondah Vegetation Strategy 2020-2030 has a vision that “In 2040 more people are deriving the health and wellbeing benefits, and more plants and animals are deriving the habitat benefits, of living amongst abundant and diverse vegetation in Maroondah”²⁹.

The Strategy’s preface outlines that:

*The Maroondah Vegetation Strategy establishes Council and the community’s vision for protecting, enhancing, restoring, and creating vegetation in Maroondah’s natural and urbanised areas. The Strategy contains actions in areas including: vegetation management and conservation, policy and planning controls, advocacy, education, and support to community*³⁰.

The Strategy contain three outcomes as follows³¹:

Outcome 1: A more liveable Maroondah - more vegetation, especially an extensive canopy of trees connecting bush and urban environments, providing shade, cooling, pleasant and tranquil green spaces, water absorption, and habitat elements, that supports community health, wellbeing, and childhood development by helping people connect with nature, avoid heat-related illnesses, reduce anxiety and stress, mitigate flooding risk, and engage in outdoor physical activity (walking/riding/playing).

Outcome 2: More nature throughout Maroondah - more vegetation, in the form of a well-connected network of indigenous trees, shrubs and understorey plants providing a wide range of habitat elements such as the food, shelter, and opportunities to move through the landscape that indigenous flora and fauna in Maroondah need to flourish, and simultaneously create more opportunities for people to encounter and connect with nature close to where they live, work and play.

Outcome 3: Council support - Maroondah City Council is supporting implementation of this Strategy with vegetation policy and direction that provides clarity of purpose, organisational arrangements that facilitate collaboration both internally and externally, and measurable targets coupled with monitoring and reporting of progress that drive action. All types of vegetation play a role in achieving these outcomes, and Council has responsibilities that influence vegetation management in four key areas:

1. Planning and management of vegetation public assets and open spaces.
2. Administration of the planning scheme that guides Maroondah’s ongoing growth and development.
3. Providing information and support to guide community action.
4. Leadership and influence.

The Strategy contains a number of key directions and priority actions to achieve the objectives. Of most relevance to the Ringwood and the catchment area are as follows:

Priority Action: 2.2(b) Advocate for major investment into restoring natural and cultural waterway and riparian condition along waterways such as Mullum Mullum Creek, to improve habitat corridor function, and passive recreational access and use.

In late 2023 the Mullum Mullum Creek collaboration commenced as a partnership between Maroondah and Manningham Councils and Melbourne Water.

²⁸ [Maroondah Vegetation Strategy 2020-2030 | Maroondah City Council](#)

²⁹ Maroondah Vegetation Strategy 2020-2030, page 3

³⁰ Maroondah Vegetation Strategy 2020-2030, page 4

³¹ Maroondah Vegetation Strategy 2020-2030, page 14

The Mullum Mullum Creek Collaboration aims to facilitate a whole of catchment approach to managing and caring for the Mullum Mullum Creek and build a broad culture of custodianship across the community.

Twenty-two organisations³² which are connected to and have responsibilities for Mullum Mullum Creek have been represented at Collaboration initiation workshops, establishing a commitment to work together and identify a shared way forward for a Mullum Mullum Collaboration. Participants include: Traditional Owners, community groups, Councils and government agencies, along with schools, businesses, residents and other landowners.

Ten of these organisations have taken active roles in co-designing a Vision and Blueprint to guide the direction and priorities for creek and catchment care, and for Collaboration governance, over the next decade. The Collaboration is also commencing work on a governance framework and an implementation plan for priority management actions on the creek.

A collaboration is required as the Mullum Mullum Creek corridor includes numerous significant bushland reserves with important natural values, harbouring a diverse range of remnant fauna and flora. As an urban waterway it is also subject to a range seemingly intractable threats and impacts. Catchments extend beyond single Council areas and organisational boundaries.. A threat to one part of the creek often has its root cause upstream, in another jurisdiction, or another part of the catchment.

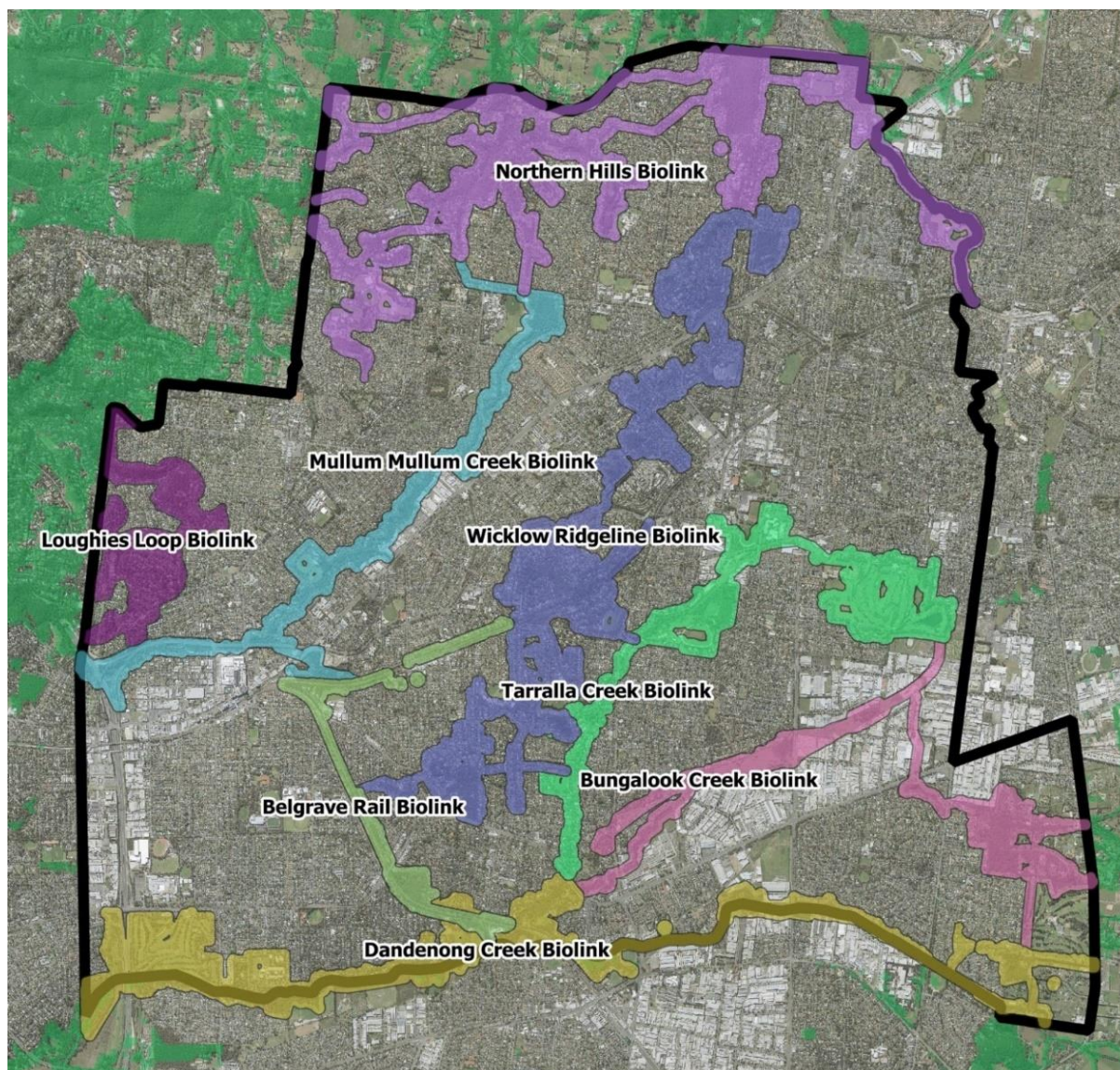
The Mullum Mullum Collaboration will enable bodies to work together to tackle complex systemic threats and facilitate positive change and action in the catchment.

Priority Action 2.3(b) Review the 2005 Habitat Corridor Strategy to confirm priority linkage routes and align with this strategy's focus on habitat for a suite of 'focal' species, and accurately depict their spatial extent and arrangement on Council's GIS system.

The outcome of this action has been the identification of strategically important locations that offer the best opportunity for flora and fauna habitat connectivity and function across Maroondah through the Maroondah Habitat Connectivity Plan³³. This has resulted in the identification of eight biolinks across Maroondah to improve habitat connectivity.

³² Including unaffiliated residents, landowners and individuals

³³ Maroondah Habitat Connectivity Plan Maroondah City Council, ecological Australia, [Biodiversity and habitat connectivity | Maroondah City Council](#)



Maroondah's biolinks provide habitat connectivity

Two of these biolinks are located within the Ringwood MAC and catchment area, the Mullum Mullum Creek Biolink and the Belgrave Rail Biolink.

Council has developed a draft Mullum Mullum Creek Biolink Action Plan which was placed on community consultation between 8 November and 10 December 2023. Prior to this consultation a group of key stakeholders helped draft the Biolink Plan³⁴.

The consultation showed that 94.8 percent of respondents supported the creation of biolinks in Maroondah and that 95.5 percent of respondents supported the visions for the draft Mullum Mullum Creek Biolink Plan.

The Mullum Mullum Creek Biolink Action Plan outlines a number of actions to meet the needs of seven focal species, actions to support the biolink, actions to sustain the biolink and actions to connect the community to the biolink³⁵. The final Mullum Mullum Creek Action Plan and a rolling 2 year implementation plan to be considered at a Council meeting following Council elections in October 2024.

³⁴ Including Melbourne Water, Department of Environment, Land, Water and Planning, Connect East/EastLink, Eastland and several community organisations

³⁵ Draft Mullum Mullum Creek Biolink Action Plan, page 11, [Documents | Help establish the Mullum Mullum Creek Biolink | Your Say Maroondah](#)



The Belgrave Rail Biolink proposed to be developed within the next 5 years and will go through the same process of development of a draft biolink plan with an implementation plan.

Priority Action: 3.5 Establish a reliable and cost-effective method for ongoing monitoring of tree and shrub cover, starting with trialling of the suitability of 'Tree Ledger', and set Maroondah-wide tree canopy and shrub cover targets that are aligned with the Living Melbourne strategy.

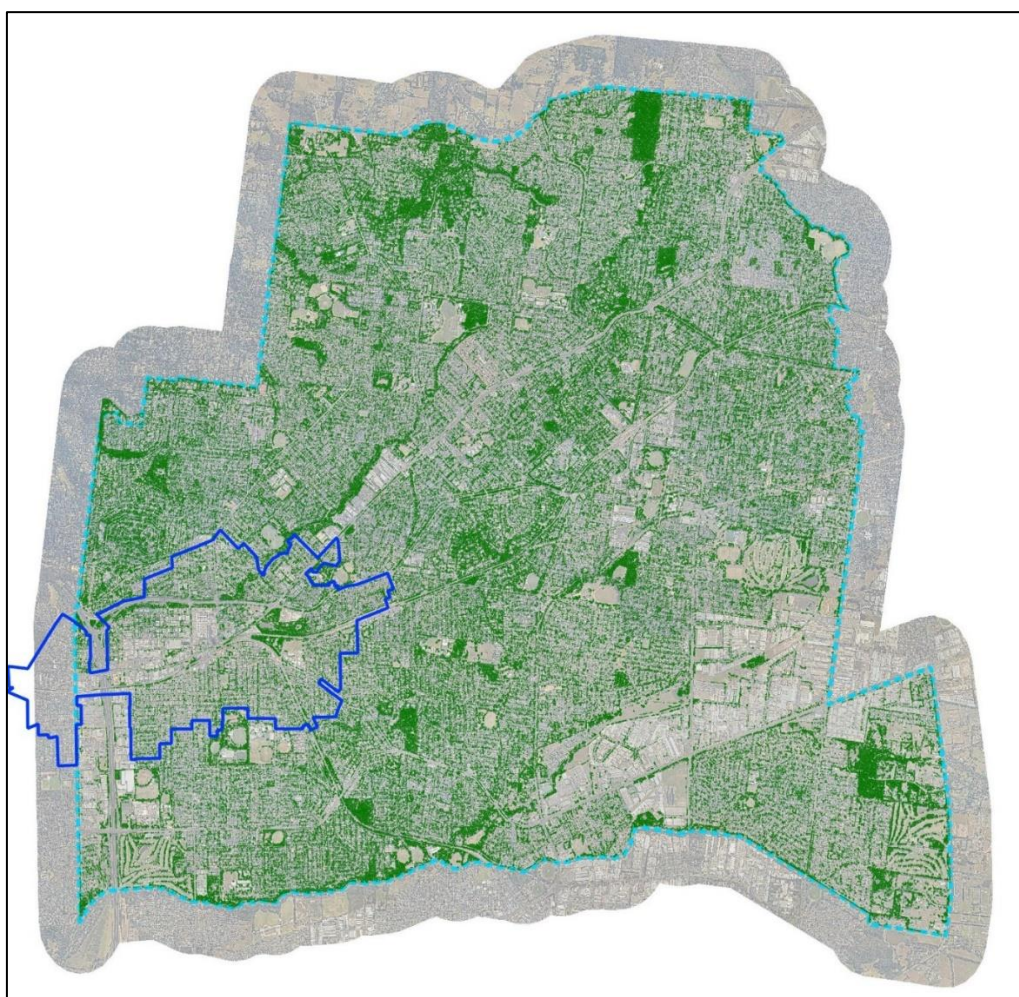
Canopy cover is an important characteristic of the urban environment of Maroondah and is highly valued by the community. In order to record tree canopy cover across Maroondah and track whether canopy is increasing or decreasing, Council has commissioned Tree Ledger™ to provide this data.

Tree Ledger™ is a software workflow (artificial intelligence) that detects foliage cover from aerial imagery to create georeferenced observations of individual tree canopies. This enables the mapping and monitoring of individual and broad canopy cover changes over time. Maroondah has annual council-wide Tree Ledger™ data from 2016 to 2024 inclusive.

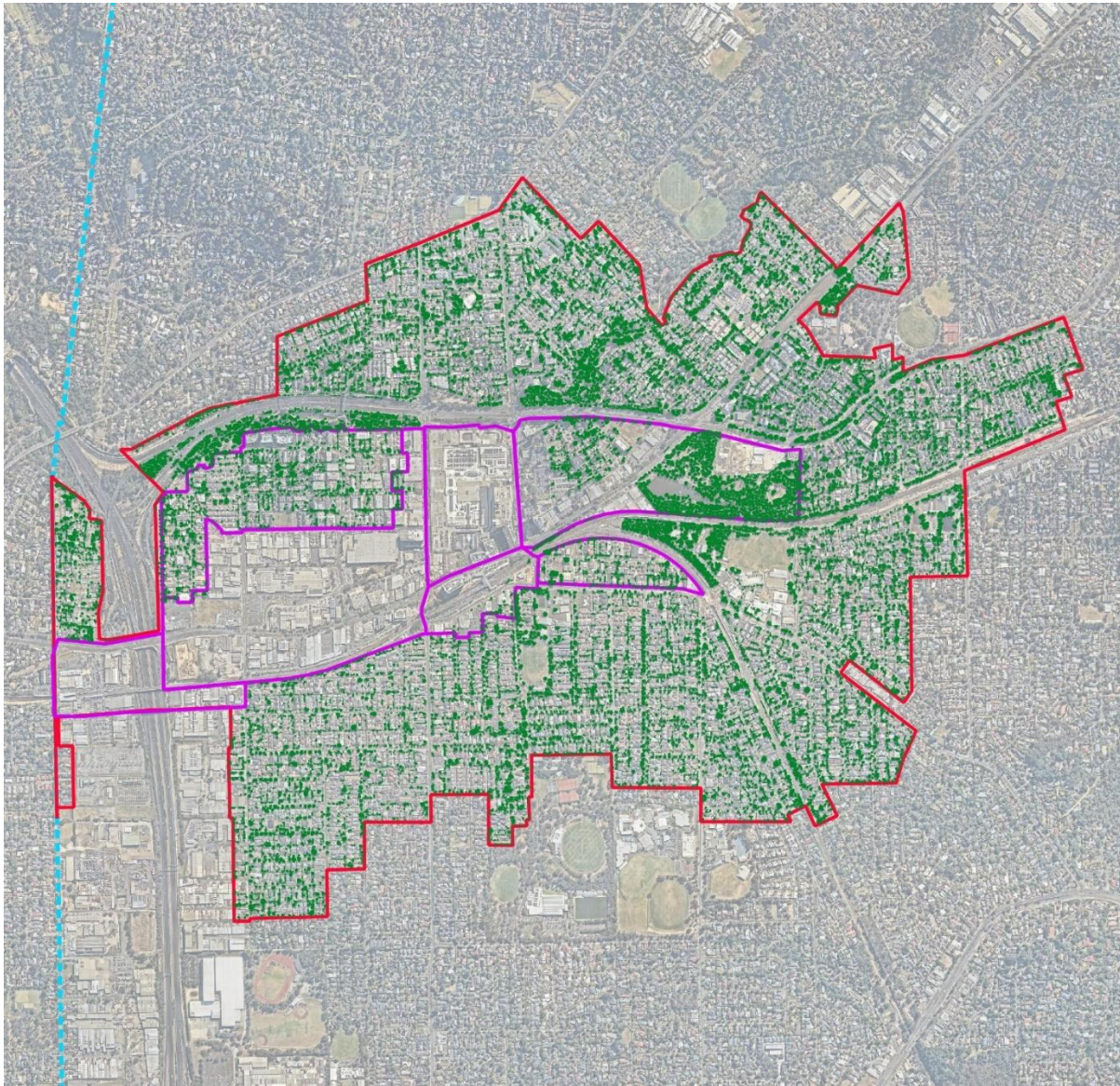
Maroondah has the fourth highest level of canopy cover for metropolitan Councils, with only Yarra Ranges, Nilumbik and Manningham having great canopy cover, and these Councils all have large green wedge areas.

The data from Tree Ledger™ shows that Maroondah currently has 28.9 percent tree canopy cover in total across the municipality. This data also shows:

- The Ringwood MAC and catchment area (Maroondah only) is 7.6 percent of the total land area of the municipality.
- This area has an existing canopy cover of 21.1 percent.
- The canopy cover in the MAC and catchment area by zone can be broken down as follows:
 - GRZ1 – 22.8%
 - GRZ3 – 20.3%
 - NRZ3 – 25.2%
 - NRZ5 – 23.3%
 - ACZ1 – 23.5%
- The GRZ and NRZ in the MAC and catchment area are 3.7 percent of Maroondah's total canopy cover.
- The SLO3 and SLO4 in the MAC and catchment area have a canopy cover of 23.6 percent and make up 5.5 percent of Maroondah's overall canopy cover.



Maroondah's tree canopy cover



Tree canopy within the VPA's proposed Ringwood Catchment

The loss of canopy cover, particularly in the catchment would have a significant impact on the overall canopy cover in Maroondah.

The importance of biodiversity, tree canopy, green and blue infrastructure and urban cooling and greening are recognised in Plan Melbourne, the Planning Policy Framework as well in other strategies that have been adopted and endorsed by Council. This is based on consultation undertaken by Council across many projects and strategies, including the recent Maroondah 2050 Community Vision consultation.

Within the revised Ringwood Metropolitan Activity Centre Masterplan, it is noted that as part of the engagement for the 2018 Masterplan *“Green’ was the most common word used to describe the community’s vision, indicating the strong connection with vegetation, creeks, Ringwood Lake Park, open spaces and parks”*³⁶.

It also notes that *“In listening to the community the key for the future of Ringwood MAC is to maintain the link to the natural environment and create a sustainable transport environment”*³⁷.

³⁶ Draft Ringwood Metropolitan Activity Centre Masterplan 2024, page 15

³⁷ Draft Ringwood Metropolitan Activity Centre Masterplan 2024, page 15

The vision in the revised 2024 Masterplan remains as it was in the 2018 version:

Ringwood is the major urban destination in Melbourne's outer east. It will contain a vibrant city centre, with an active local economy offering contemporary lifestyle options set in a natural landscape and connected through an advanced road and rail network³⁸.

In the precinct ambition for Precincts 3 and 5, established landscape setting is included as part of the ambition.

Information provided as part of the VPA Activity Centres Program or within the Ringwood Activity Centre contains no mention of the importance of vegetation, biodiversity or blue and green infrastructure.

It is particularly concerning to Council that vegetation, biodiversity, and urban greening and cooling have not been considered at all as part of the Activity Centres Program when the value, importance and benefits of vegetation are well known. The focus on delivering housing cannot come at the cost of all other considerations. Place making is a key component of planning, and protecting and enhancing vegetation is one of many key elements that help shape healthy and successful places.

Vegetation provides so many benefits including shade, cooling, tranquillity, and stormwater management. It supports health and wellbeing, contributes to positive childhood development, helps manage heat related illness, reduces anxiety and stress and creates places that encourage people to be active and engaged.

The Mullum Mullum Creek is used for passive and active recreation including walking and cycling and is a vital green space in a very urban area. Any adverse development impacts on the creek and its surrounding area will diminish the integrity of this space, particularly its ecological values. New development within a close proximity to the creek needs to respond to the creek in a way that protects the visions and values for this area. The VPA catchment proposals undermine these imperatives.

Consistent with community sentiment and Council's strategic work, Council strongly argues that vegetation be recognised and protected in the MAC and its catchment.

11. Social and affordable housing

Under the *Planning and Environment Act 1987* objective (fa) is to facilitate the provision of affordable housing in Victoria.

Direction 2.3 of *Plan Melbourne* seeks to increase the supply of social and affordable housing, and recognises the need to provide a range of housing types within suburbs across Melbourne to improve local affordability across Melbourne³⁹.

Clause 16.01-2S (Housing affordability) seeks to deliver more affordable homes closer to job, transport and services. Housing affordability will be improved by increasing housing diversity and choice, encouraging a significant proportion of new development to be affordable for households on very low to moderate incomes and increasing the supply of well-located affordable housing.

Victoria's Housing Statement, The decade ahead, 2024-2034, notes that the activity centres program "will also consider the best way to incentivise more affordable housing"⁴⁰.

The *Draft Ringwood Activity Centre Plan* notes that the catchment will provide an opportunity for more housing diversity "including quality social and affordable housing"⁴¹.

³⁸ *Draft Ringwood Metropolitan Activity Centre Masterplan 2024*, page 17

³⁹ *Plan Melbourne 2017-2050* Direction 2.3, page 55

⁴⁰ *Victoria's Housing Statement, the decade ahead, 2024-2034*, 01 Good decisions, made faster, page 11

⁴¹ *Draft Ringwood Activity Centre Plan August 2024*, Section 3.2, page 10

Under Section 4.5 the Draft Ringwood Activity Centre Plan states that “applications for residential subdivision and development should consider how they contribute to meeting the need for affordable housing”.⁴² It notes that this contributions can be delivered via the following options:

- Discounted sale or gifting of homes to a Registered Housing Agency or Homes Victoria which provides affordable housing
- A cash contribution equivalent to the above to the Social Housing Growth Fund or nominated trust account to the satisfaction of the responsible authority.
- Any other delivery method that provides for affordable housing, subject to the approval of the responsible authority.

It also notes that this is in conjunction with a number of local, state and federal government initiatives and that “government is seeking feedback on the “Big ideas for Victoria’s future” through the Plan For Victoria consultation process. Ideas include setting a minimum amount of social and affordable housing in new developments”⁴³.

Council strongly encourages the Victorian Government to consider the introduction of mandatory targets, particularly for activity centres where land is well located and has excellent access to public transport, and everyday services. Voluntary agreements are resource intensive for Council and are often not factored into development costs. Having an upfront requirement would allow developers to include social housing in their costs. It is a lost opportunity that the Activity Centres Program does not include mandatory requirements for social and affordable housing.

12. Community Infrastructure and Assets

It is an objective of planning in Victoria to “enable the orderly provision and co-ordination of public utilities and other facilities for the benefit of the community”⁴⁴. Victoria’s Housing Statement outlines an objective to provide 70% of Victoria’s housing growth within established suburbs and provides a commitment that the State government will ensure that they will stay places where Victorians want to live by delivering “vital community infrastructure in those suburbs”⁴⁵. One of the key drivers for restricting urban sprawl is the comparatively cheaper provision of infrastructure in established suburbs.

In 2021 there were 1,701 dwellings within the Ringwood MAC. A total of 2,648 people were housed in those dwellings. Average household sizes within the MAC were below 2 persons per household, with household sizes extending up to 2.53 persons in the surrounding area, marginally below the Maroondah average of 2.56.⁴⁶

It is anticipated that by 2051 an additional 8,200 to 12,200 dwellings would be constructed in the Centre and its catchment. By any measure this is a significant increase in housing. It is anticipated that the number of residents would increase by similar levels, although no modelling has been released in relation to a future population of Ringwood or its characteristics. Informed Decisions (.id) forecast that by 2046 the average household size in Maroondah will be 2.44 persons per household⁴⁷. This would indicate that by 2051 in the order of 20,000 to 29,800 people would call Ringwood MAC home.

⁴² *Draft Ringwood Activity Centre Plan August 2024*, Section 4.5, page 15

⁴³ *Draft Ringwood Activity Centre Plan August 2024*, Section 4.5, page 15

⁴⁴ *Planning and Environment Act 1987* section 4(1)(e)

⁴⁵ *Victoria’s Housing Statement, the decade ahead, 2024-2034*, page 15

⁴⁶ [Social atlas | City of Maroondah | atlas.id](#), retrieved 19 September 2024

⁴⁷ [Population, households and dwellings | City of Maroondah | Population forecast \(id.com.au\)](#), retrieved 19 September 2024

If the current demographics for Ringwood MAC apply, this will include:

- 2,401 to 3,572 persons over the age of 65,
- 1,140 to 1,697 children aged up to 4 years, and
- 1,421 to 2,114 school aged children.

These additional residents will have the need for parks and other areas for recreation, education facilities (including kindergartens, schools and higher education), transport and health care. The dwellings in which they will live will place significantly greater demands on utilities, and additional runoff can be expected where increased development reduces the effective permeability of land.

At present Development Contributions Plans for the Ringwood MAC and Ringwood Greyfield renewal precinct seek to collect contributions to set infrastructure based on growth of 1,529 dwellings by 2038 and 210 dwellings by 2035 respectively. These contributions, and the infrastructure that they will help fund, will be inadequate to meet the needs of the population growth now planned.

It is an objective of the Victoria Planning Provisions to “manage the sequence of development in areas of growth so that services are available from early in the life of new communities.”⁴⁸ The *Precinct Structure Planning Guidelines* (Victorian Planning Authority, 2021) highlights the need to set aside land for infrastructure, and that delivery of infrastructure needs to be both planned and actively managed. It is considered that the principles that it contains are relevant to the large-scale growth proposed for key activity centres.

This will include:

Directing the staging and location of development within a PSP to:

- *Use available capacity in existing infrastructure*
- *Support the orderly and economic extension or augmentation of existing infrastructure*
- *Match the timely provision of new infrastructure.*

*This will include directing the location and timing of development and identifying trigger points for the provision of required infrastructure.*⁴⁹

One of seven aims of the current pilot program to facilitate increased housing supply through a “new and simplified to infrastructure contributions” and that:

*The program will deliver a simple approach to infrastructure contributions to contribute to the funding of community infrastructure, open space, walking, cycling and transport infrastructure. The infrastructure will support these growing centres and will include mechanisms to contribute to funding their delivery.*⁵⁰

It identifies that the new approach will be future work to be conducted by “the Victorian Government, Maroondah City Council or other agencies”⁵¹. As it stands this scenario is inadequate. The document continues on to state that the State Government is exploring options for a simplified funding mechanism which “could provide direct contributions for councils and State Government to deliver essential infrastructure like roads, community centres and local sporting facilities to support growing and changing communities”⁵².

⁴⁸ Maroondah Planning Scheme, Clause 11.02-3S

⁴⁹ *Precinct Structure Planning Guidelines* (Victorian Planning Authority, 2021), page 97

⁵⁰ *Draft Ringwood Activity Centre Plan August 2024*, page 5

⁵¹ *Draft Ringwood Activity Centre Plan August 2024*, page 14

⁵² *Draft Ringwood Activity Centre Plan August 2024*, page 15

However, whilst the plan identifies that the “activity centre plan [i.e. the document itself] will guide investment in the things a growing suburb needs like community facilities, bike paths and upgrading parks and open spaces”⁵³, no identification of needs is included within it.

Council is aware that the VPA has been conducting an audit of current infrastructure. Of note no information has been provided on what additional infrastructure will be required either within the Activity Centre Plan or separately to Council, where it will be located, how it will be funded or what will trigger its delivery. These fundamental questions must be answered before planning controls are modified to implement the Activity Centre Program for Ringwood. For example:

- At present the Great Ryrie Primary School has approximately 500 students and the Ringwood Secondary College has approximately 1,600 students. The figures above would indicate that extensive works and/or additional school/s will be required to meet demand.
- The anticipated population increase will result in a significant demand for additional public open space. Estimates of appropriate provision vary significantly but are anticipated to exceed an additional 60 ha within the MAC and its catchment.

Resources and space need to be set aside for this infrastructure from the outset.

13. Conclusion

Council would once again like to thank the VPA for the opportunity to work with it on changes to the Ringwood MAC Masterplan 2018. Subject to some finetuning, it supports the changes to the Masterplan.

It is unclear from discussions held to date and from the public engagement what form proposed changes will take. Council requests the ability to provide meaningful input into proposed planning scheme changes, including the opportunity to present in person to the Standing Advisory Committee.

Council’s research and prior work indicates that a wholesale change to the type of development permitted within the Ringwood MAC’s catchment is not required in order to achieve the dwelling numbers desired and would result in a significant detrimental impact to Maroondah’s environment and resident wellbeing. Controls, including the extent of the mapped catchment, should be adjusted in light of this information.

The process Council has undergone to assess the suitability of the proposal highlights the need for a considered and bespoke approach to planning for each activity centre. This will involve adjustments to matters such as mapped catchments, the height and site cover of built form, etc. as dictated by the individual circumstances which apply to each activity centre.

⁵³ *Draft Ringwood Activity Centre Plan August 2024*, page 15