

155 RUTHERFORD ROAD, TOOLAMBA

GREATER SHEPPARTON PLANNING SCHEME AMENDMENT C224
TOOLAMBA GROWTH PLAN
PRESENTATION OF SUBMISSION NO. 33
29 JUNE 2021

PREPARED BY SPIIRE ON BEHALF OF R. LUSCOMBE AND TOOLAMBA CORP PTY LTD

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1. INTRODUCTION

- 1.1 This submission to Greater Shepparton Planning Scheme Amendment C224 is made by Spiire on behalf of Ray Luscombe, the landowner, and Toolamba Corp Pty Ltd, proponents for the residential rezoning and development of the property known as 155 Rutherford Road, Toolamba.
- 1.2 In this submission the land identified as 155 Rutherford Road, Toolamba is referred to as the “subject site”.
- 1.3 Pursuant to the Greater Shepparton Planning Scheme, the subject site is currently within the Farming Zone Schedule 1, and is slightly affected by the Floodway Overlay in the north eastern corner.
- 1.4 The original development proposal for the site, as put forward to Council in 2018, proposed approximately 50 lots of 3,000m² or greater, to be developed in the short term.
- 1.5 The development did not include connection to reticulated sewer services as infrastructure was not available for connection, and Spiire’s assessment found installation of infrastructure to connect the site to the Tatura Wastewater Treatment Plant to be unviable for 50 lots. As such, the allotment size was determined by a thorough Land Capability Assessment prepared by Paul Williams.
- 1.6 This submission outlines the benefits of the preferred development of the site and provides a response to the Toolamba Growth Plan and Amendment C224.
- 1.7 Greater Shepparton Planning Scheme Amendment C224 seeks to implement the recommendations of Toolamba Growth Plan 2020 (the Growth Plan) and the Toolamba Housing and Streetscape Typologies 2020. Amendment C224 proposes to amend Clause 21.04 Settlement, including a revised Toolamba Framework Plan (the Framework Plan), and includes the Growth Plan as a Reference Document at Clause 21.09 of the Greater Shepparton Planning Scheme.
- 1.8 The major points put forward in this submission are:
 - ▶ It is the preference for the site to be developed for approximately 50 lots of 3,000m² or greater.
 - ▶ This development scenario:
 - is supported by a thorough Land Capability Assessment in the absence of reticulated sewer infrastructure,

- reflects community aspirations for residential development within Toolamba,
 - will meet the short-term need for housing,
 - provides another growth front option to Toolamba, and
 - will offer the residential market a point of difference to the product and lot size mix proposed by Amendment C168.
- ▶ The subject site is suitable for moderate density residential purposes for the Short Term for the following reasons:
- there is demand for, and a preference for, low density residential land in Toolamba.
 - moderate density offering is different to the standard residential offering of Investigation Area No. 6/Amendment C168, providing multiple development fronts, housing choice and diversity for the market.
 - the subject site is well located, and community services are in close proximity.
 - assessments for land capability, ecological and potential contamination have been undertaken, and there are no impediments to the site’s moderate density residential development.
 - providing additional residential land in the short term will assist in housing affordability in Toolamba.
- ▶ However, without prejudice to the preferred scenario outlined above, this submission requests in the event the site must connect into existing reticulated infrastructure it be designated for a mix of Short Term Higher Density and Short Term Moderate Density so as to enable the feasible residential development of the site.
- 1.9 For reasons outlined in this submission, it is respectfully requested the Toolamba Framework Plan at Clause 21.04 as exhibited be amended by identifying the site for both Higher and Moderate Density, to be developed as such in the event it must connect to existing reticulated sewer services.
- 1.10 In the event reticulated sewer services are not available, the site be developed in line with a Land Capability Assessment as per the provisions of the Growth Plan and the proposed Clause 21.04. The above designation will also facilitate this outcome.

2. THE SUBJECT SITE AND ITS CONTEXT

- 2.1 The subject site comprises a generally square shaped area, comprising two parcels divided by the Toolamba-Echuca Railway line. It has an area of approximately 28 hectares, of which 22 hectares are south of the railway line.
- 2.2 The land is predominantly flat and relatively clear of native vegetation and agricultural infrastructure, except for clustered trees along the property boundaries and scattered paddock trees.

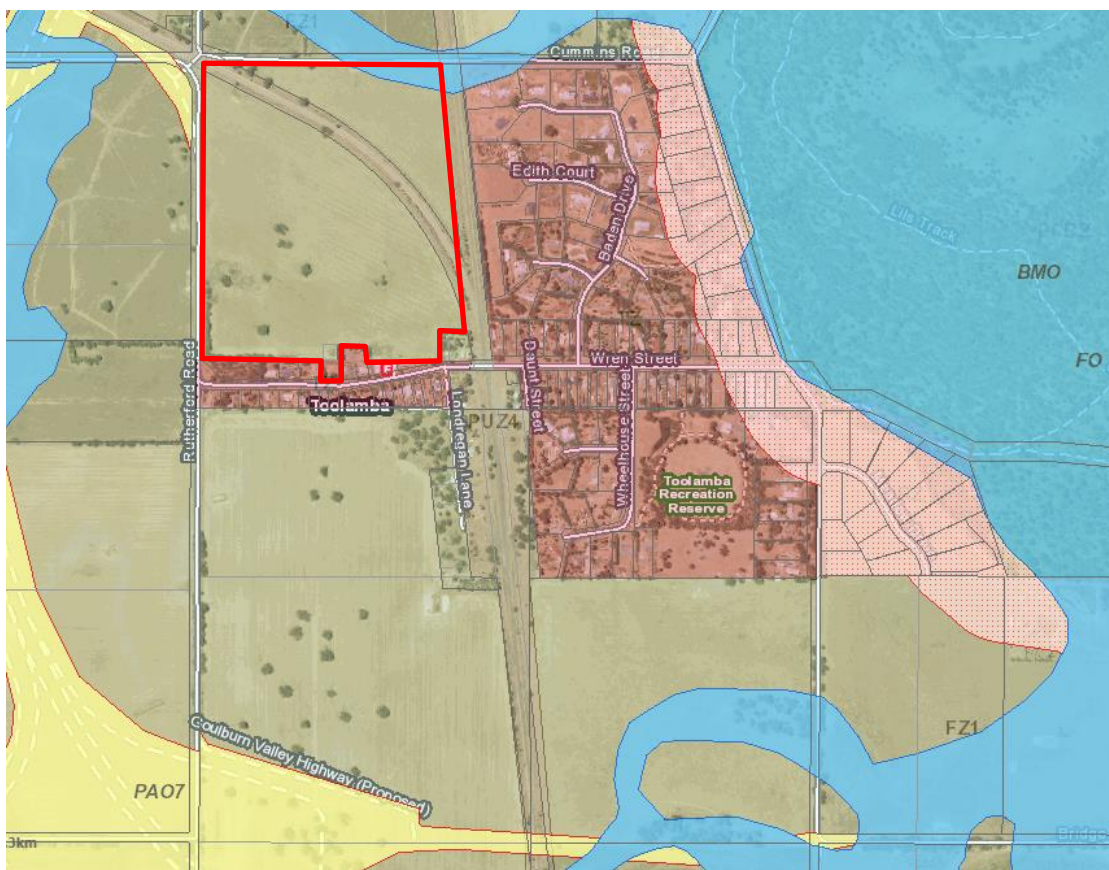


Figure 1: Site Locality Plan (source: <https://mapshare.vic.gov.au/vicplan/>)

- 2.3 The subject site is currently within the Farming Zone Schedule 1 and slightly affected by the Floodway Overlay in its north-eastern corner. It is not within an Area of Aboriginal Cultural Heritage Sensitivity.
- 2.4 The subject site has historically been used for agriculture, mainly cropping.

- 2.5 As well as being traversed by the Toolamba-Echuca Railway Line, the site is bound by the Melbourne-Shepparton Railway Line along its eastern boundary. Further east of the subject site is developed with a recently completed low density residential development.
- 2.6 It is also bound by established residential development, the Junction Hotel and Wren Street to the south. Land south of Wren Street is developed with long established residential development (0.5ha -1.5ha). Further south is the existing Investigation Area No. 6, proposed for *“Higher Density (800-2000m² lots)”*.
- 2.7 Land to the north of the site and north of Cummins Road, and west of Rutherford Road is used for broad-hectare agriculture with two rural dwellings. This land is designated for Low Density (4,000m² + lots) in the proposed Framework Plan (proposed Clause 21.04).
- 2.8 Rutherford Road to the site’s west provides easy access to Toolamba Road and the future Goulburn Valley Highway/Shepparton Bypass interchange to the west. Land between the Bypass alignment and Rutherford Road is identified for Potential Mix Use.
- 2.9 Reticulated water, power and telecommunication infrastructure are available within proximity to the site. Toolamba is not currently serviced with reticulated sewer infrastructure.
- 2.10 The land is located on the north-west edge of the Toolamba town.
- 2.11 Toolamba is approximately 15 kilometres south west of Shepparton Central Business District and 12 kilometres south east of the Tatura town centre. At the 2016 Census of Population and Housing, Toolamba and its immediate surrounds had a population of approximately 770 persons. Toolamba is nearby to the Goulburn River and State Forest, and has a distinct rural village character.
- 2.12 The Toolamba Railway Station is a closed station. The passenger and freight line between Melbourne and Shepparton passes through Toolamba and borders the subject site to the east. This line is the subject of significant upgrades. At the subject site the railway line branches off towards Echuca. This line is used for freight and has not been used for passenger services since 1981.

3. WHAT THE TOOLAMBA GROWTH PLAN AND FRAMEWORK PLAN SUGGEST FOR THE SUBJECT SITE

TOOLAMBA GROWTH PLAN

- 3.1 The Final Toolamba Growth Plan designates the site for Medium Term Moderate Density (2,000m² to 4,000m² lots).
- 3.2 The Toolamba Growth Plan requires all new development west of the railway line to connect to reticulated sewer services once the infrastructure is in place. However, the Growth Plan also notes where reticulated sewer services are not available, development must be subject to a Land Capability Assessment.

TOOLAMBA FRAMEWORK PLAN

- 3.3 The Final Toolamba Framework Plan as exhibited via Amendment C224 to the Greater Shepparton Planning Scheme designates the site for Moderate Density (2,000m² to 4,000m² lots). It does not refer to a timeframe for development, however the Toolamba Growth Plan is proposed as a Reference Document at Clause 21.09.
- 3.4 The amended Clause 21.04 acknowledges in the absence of reticulated sewer, future residential development in Toolamba will be subject to a Land Capability Assessment.

4. SUITABILITY OF THE SITE FOR RESIDENTIAL DEVELOPMENT

The subject site is suitable to accommodate future residential growth. Additional and more specific reasons associated with different density outcomes are provided in following sections of this Submission.

STRATEGIC LOCATION OF THE SUBJECT SITE

- 4.1 The subject site is strategically located to accommodate residential growth, being close to services and readily accessed via Wren Street.
- 4.2 The site has the following distances to community facilities and services:
- ▶ Junction Hotel – adjoins the site to its south east in Wren Street
 - ▶ General Store/Newsagency – 210 metres east along Wren Street
 - ▶ Toolamba Recreation Reserve – 575 metres east along Wren Street
 - ▶ Toolamba Primary School – 635 metres east along Wren Street
 - ▶ Shepparton Regional Park – 1 kilometre east along Wren Street
- 4.3 Future development of the subject site can integrate into the existing and preferred town character, including the existing development along Wren Street.
- 4.4 Our clients have commissioned specialist assessments for the site, including potential contamination, ecological and land capability, as well as town planning and civil engineering advice. These assessments have not found any impediments to residential development.

CONTRIBUTION TO MEETING SHORT-TERM HOUSING NEEDS

- 4.5 Except for Investigation Area No. 6/Amendment C168, Toolamba's two recent growth areas, both being low density residential, are completely or very near to being fully sold and occupied.
- 4.6 One is opposite the site to the east, accessed via Wren Street and McNamara Road. There are very few vacant allotments remaining in this neighbourhood.
- 4.7 The second is known as Meadow Wood Estate and is to the south east of the town centre, accessed via Bridge Road. The development comprises 15 low density lots, sized around 4,000m² and between 6,000m² and 1 hectare where abutting the State Forest. It is understood all lots have been sold.

- 4.8 Council acknowledges in its Townships Framework Plan Review 2018: *“There are minimal vacant lots available for residential development. There is no opportunity for infill development due to the existing small lot sizes and lack of reticulated sewer infrastructure”*.
- 4.9 The findings of the 2019 Residential Land Supply Monitoring Project showed Toolamba, including Old Toolamba, contained 5 vacant urban lots and 10 vacant rural residential lots. The Project indicated a population growth rate between 2011 and 2016 of nearly 4%pa and around 5 new dwellings built annually over the same period, prior to Meadow Wood Estate coming onto the market.
- 4.10 As per the 2016 Census of Population and Housing, in Toolamba, persons aged 0-14 make up almost a quarter of the population (23%), almost 50% of households have children, suggesting Toolamba is home to many families with school aged children. Additionally, enrolments at Toolamba Primary School have continuously increased, with 117 enrolments in 2012 to 160 enrolments in 2020 (<https://www.myschool.edu.au/school/44284>).
- 4.11 As per anecdotal evidence, with recent growth seeing a faster rate of development than anticipated, it is considered appropriate to rezone additional land in Toolamba.
- 4.12 Considering the recent rate of growth in Toolamba, the forecast increase in population, and that Meadow Wood Estate is sold out, additional residentially zoned land is required to provide for 15 years supply.
- 4.13 There is a clear demand for lower density residential properties as indicated by the rate at which larger lots were purchased and developed.

PROVISION OF MULTIPLE GROWTH FRONTS

- 4.14 Strategically, and as per local and State planning policy, Council should seek a variety of development fronts and housing supply options. This can be achieved by designating the subject site for “Short Term” development, facilitating its development alongside that of 335 Rutherford Road as per Amendment C168. These two development fronts will offer the residential market with diversity and choice.
- 4.15 Multiple growth fronts not only provide the residential market with variety of house lots and lifestyle choices but assist in housing affordability by increasing the rate of housing supply and by offering different price points to the market.
- 4.16** The designation of the subject site for Short Term residential development will provide a second growth front to Toolamba. Having more than one growth front also acts as a safety net in the event of unforeseen delays on the release of land at another growth front.

5. PREFERRED DEVELOPMENT OUTCOME FOR THE SITE

DEVELOPMENT DESCRIPTION

- 5.1 The preferred development for the site is for its subdivision into approximately 50 lots, each of at least 3,000m² as shown in the indicative layout in Figure 2 below.

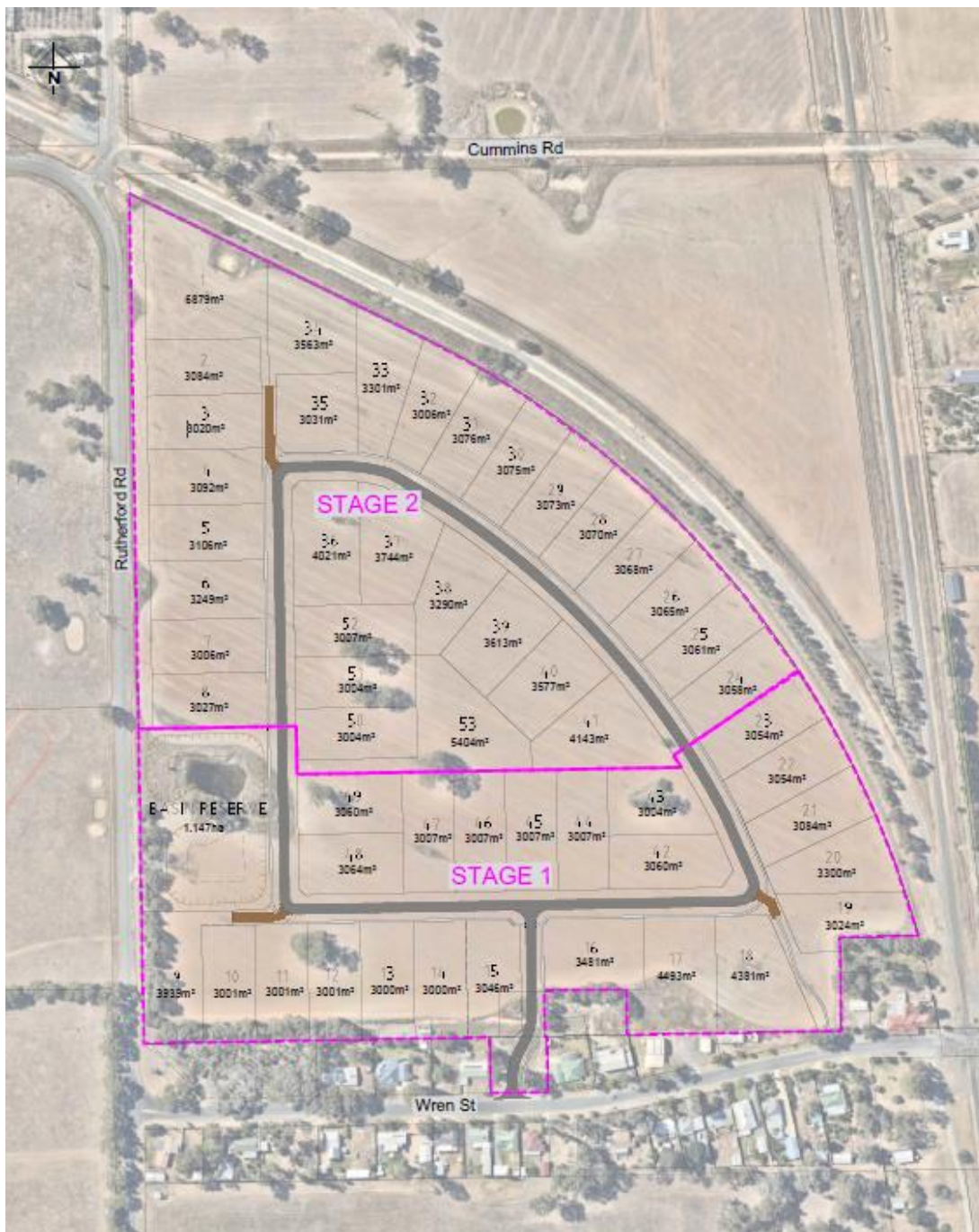


Figure 2: Indicative Site Layout Plan, Spiire

- 5.2 Vehicular access into the development is via Wren Street and an additional connection to Wren Street is provided for walking and cycling. These will provide direct links between future development at the site and local services and community infrastructure further along Wren Street, including the General Store/Newsagency and the Primary School.
- 5.3 Stormwater can be managed in a basin reserve of approximately 1.2 hectares alongside Rutherford Road.
- 5.4 Goulburn Valley Water has provided support for the proposed development and advised on upgrades required in the latter stages to service the development with adequate reticulated water.
- 5.5 The development would be undertaken in two stages and only comprise the land south of the railway line. Residential development north of the railway land was not considered viable for similar development due to the costs of connecting to reticulated water and power and associated road upgrade costs.

SUITABILITY OF THE SITE

- 5.6 At the time this proposal was initially discussed with Council, there was no reticulated sewer provisions to Toolamba. This remains the case. A Land Capability Assessment was undertaken by Paul Williams, which recommended lots be of at least 3,000m².
- 5.7 The development proposal was also supported by other specialist assessments which found no impediments to the proposed low density residential development:
 - ▶ Preliminary Site Investigation for Contamination, Douglas Partners, January 2019
 - ▶ Ecological Assessment, EHPartners, January 2019
 - ▶ Engineering/Infrastructure advice, Spiire
- 5.8 The subject site provides a logical extension for moderate density residential development in Toolamba, with consideration given to the higher densities proposed in Investigation Area No. 6 south of Wren Street. Wren Street provides an existing physical delineation between the differing residential environments and associated housing choices.

CONSISTENT WITH COMMUNITY'S PREFERRED DEVELOPMENT CHARACTER

- 5.9 Our clients wish to develop the subject site for lower density residential outcomes, consistent with the Growth Plan's objective to *"Ensure rezoning provides for development that respects the preferred character of the area, including but not limited to generous setbacks and landscaping"*.

- 5.10 As mentioned previously in this Submission, research has been undertaken by the proponent into their vision and preferred character of development. As such a moderate density development is preferred, to reflect both the existing and preferred character of Toolamba. This manner of development will also integrate with the abutting development along Wren Street.
- 5.11 The development provides a low-density, rural character development, each lot with sufficient area for a dwelling, effluent envelope, outbuildings, generous setbacks and opportunity for landscaping.
- 5.12 This preferred character is regularly referenced in the Toolamba Growth Plan and was nominated as a key feature of Toolamba during the community consultation undertaken for the preparation of the Growth Plan.
- 5.13 Design measures, such as landscaping, designation of building envelopes, fencing types, lot orientation and the like, will be utilised throughout the development to provide a low density/rural village ambience.

PROVIDES THE MARKET WITH A VARIETY OF HOUSING OPTIONS

- 5.14 If C168 proceeds as proposed, this development and the development of our client's property should both be offered to the market in the short term. They can each offer a different housing option, neighbourhood character and lifestyle choice to the residential land market.
- 5.15 The preferred development of the subject site will contribute significantly to the supply of lower density allotments in Toolamba, offering the market with choice and diversity when compared with the proposed densities of Amendment C168.
- 5.16 The lack of moderate density zoned land currently available and the inability to develop the site in the short term will threaten the provision of moderate density residential land supply in Toolamba. Much research has been undertaken by the proponents into understanding the local market and appreciating the product mix and lot size preferred by their market. As such the landowners are willing for the subject site to be developed in the immediate future. The availability of this land for development would continue to meet the needs of Toolamba's residential land supply, as well as providing a point of difference to that of Amendment C168.

6. WITHOUT PREJUDICE DEVELOPMENT OPTION

- 6.1 Notwithstanding the preferred development outlined in Section 5 of this Submission, a without prejudice development scenario is discussed below on the basis the land at 335 Rutherford Road is developed in the immediate future as per the documentation included in Amendment C168, including the provision of reticulated sewer services.
- 6.2 Following review of submissions from Goulburn Valley Water and from the proponents for Amendment C168, a greater understanding of the proposed provision of reticulated sewer to Toolamba has been gained.
- 6.3 The following is understood:
- ▶ The residential development of 335 Rutherford Road must include the provision of reticulated sewer infrastructure to connect that site to the Tatura Wastewater Treatment Facility.
 - ▶ It is Council's intention this infrastructure be provided to cater for the whole of the catchment. It is understood the current assessment considers the whole of the catchment at the anticipated/forecast densities but doesn't consider the costs of connection.
 - ▶ A Sewer Rising Main (SRM) is proposed along either the Toolamba-Rushworth Road or Bitcon Road to provide connection to a Sewer Pump Station (SPS) located within at 335 Rutherford Road to service that development.
 - ▶ The SRM has been sized to cater for additional land areas based on proposed densities, however if these densities are to be increased, or commercial/industrial in nature, the SRM size will need to be reconsidered, and potentially upsized.
 - ▶ The pipe sizing and SPS specified for the reticulated sewer infrastructure may include developable land west of the railway line but does not provide the costs for the connection of the whole catchment, including the existing township and future development sites east of the railway line, to the SRM.
 - ▶ The costs of connection to the existing development, including land to the east of the railway line is unknown, and may be of concern to the timing of the delivery of the infrastructure.
 - ▶ All costs of the infrastructure, including design and construction, are to be borne by the developer.
 - ▶ Holistic consultation between landowners, their consultants and GVW is suggested to determine location and depth of the SPS and cost apportionment.
- 6.4 Commonly in a cash flow analysis for land development, all costs of development, including costs for the land, consultants, design and construction, authority fees and charges, legal, finance, marketing and selling costs, are calculated on a per lot basis, assisting in determining the minimum price for which the lots should be sold for. Generally, the higher the lot yield, the lower the per lot costs are as there are more lots to distribute the costs between.

6.5 On this basis, the following development option is requested for the feasible development of the subject site:

- ▶ The ability to increase lot yield by permitting smaller lots of 800m².
- ▶ The inclusion of a smaller lot size within the area approximately defined by Stage 1 of the development proposal (see Figure 2). This area could offer lots ranging between 800m² and 2,000m².
- ▶ The area designated for Stage 2 could offer lots from 2,000m² and above, depending on the feasibility analysis of the costs of development.

6.6 This scenario is generally consistent with the *Draft Toolamba Growth Plan* provided for public comment in December 2019 (see dashed black line in Figure 3 below) whereby 40% of the land south of the railway line was included for Short Term Higher Density and the balance for Short Term Moderate Density.

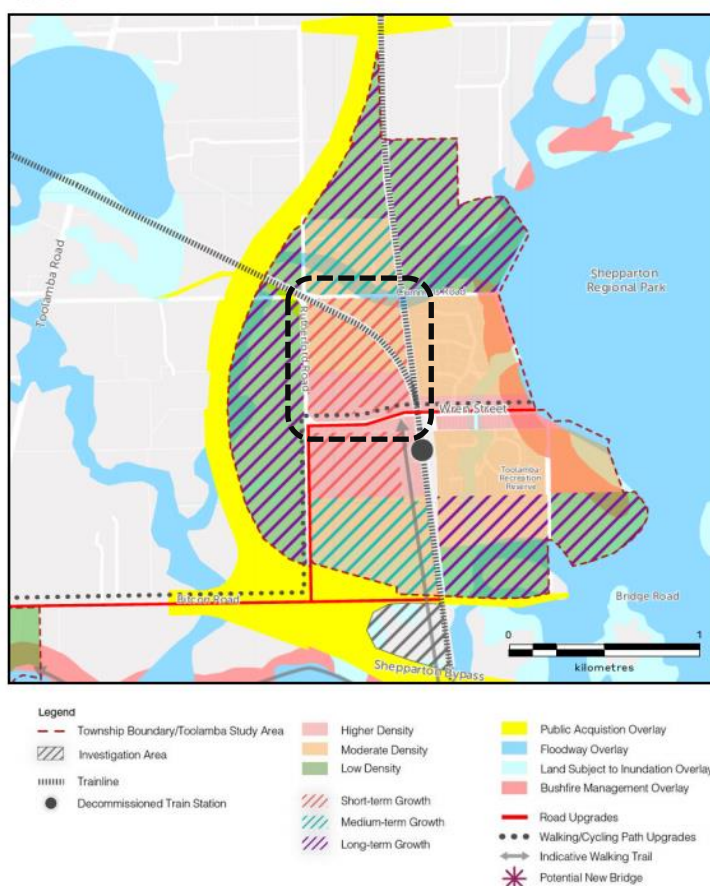


Figure 13: Enlarged map of Toolamba's Strategic Framework Plan

Figure 3: Draft Framework Plan, Draft Toolamba Growth Plan, Greater Shepparton City Council, December 2019

6.7 As shown below in Figure 4 the Final Toolamba Growth Plan has a small portion of the subject site designated for Higher Density however this would barely provide depth for one row of smaller lots, eliminating any possibility of a feasible development option for the site.

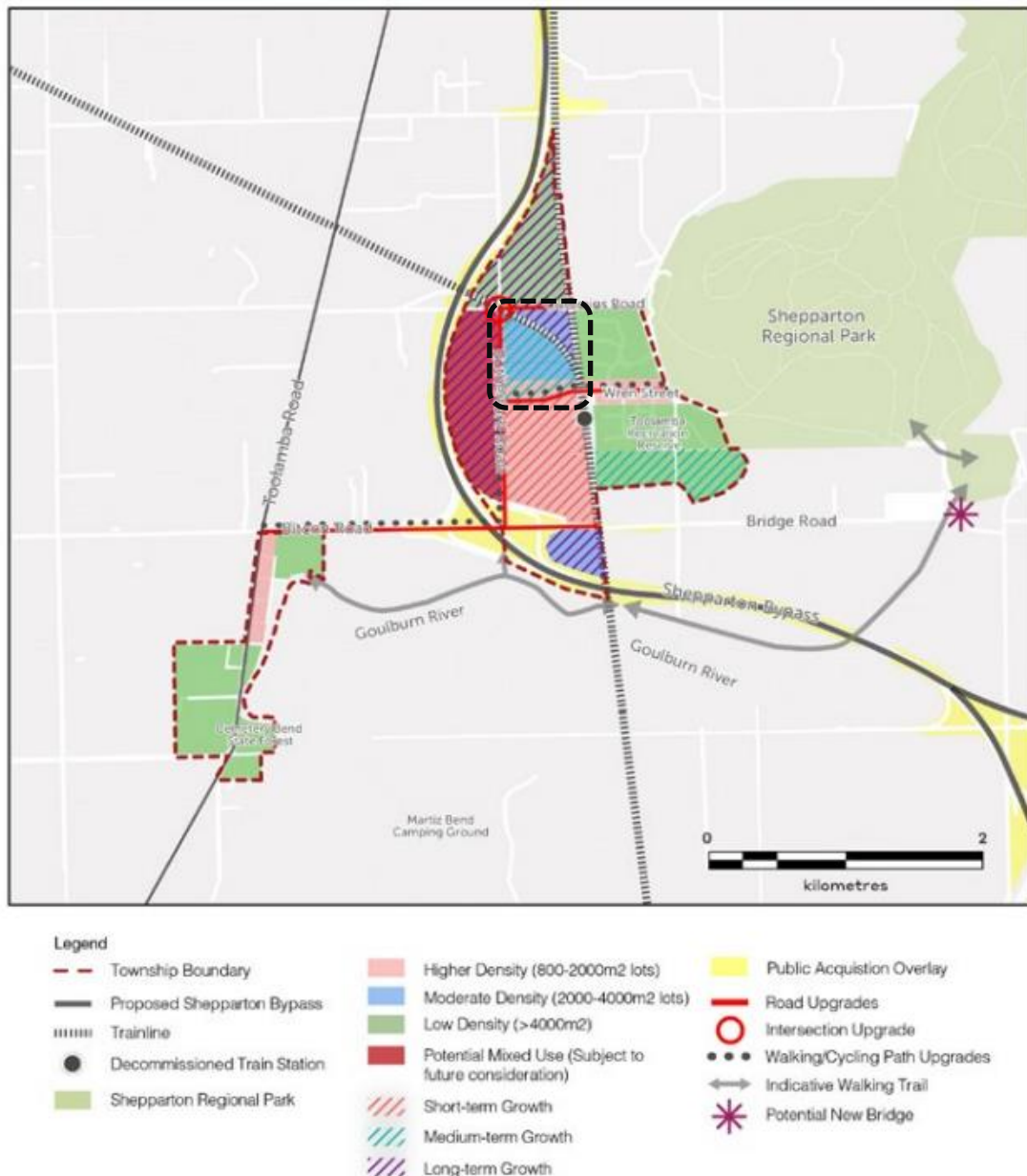


Figure 4: Final Framework Plan, Toolamba Growth Plan, Greater Shepparton City Council, July 2020

6.8 At this stage, the following reticulated sewer infrastructure costs are unknown:

- ▶ Cost to share a SPS to service the subject site
- ▶ Cost to connect the subject site to the proposed SPS and/or SRM
- ▶ Cost, if any, associated with increased pipe sizes to cater for the lot yield of the subject site.

6.9 Given the unknowns associated with costs of connection to reticulated servicing, and the reliance at this stage upon the development of land at 335 Rutherford Road, it is respectfully requested the property be given the following designations:

- ▶ 50% for Higher Density (lots 800m² to 2,000m²), with this area being north of Wren Street, consistent with the proposed addition to Clause 21.04 “...so conventional density development will be limited and focused on land in proximity to Wren Street.”
- ▶ 50% for Moderate Density (lots 2,000m² to 4,000m²), also consistent with the proposed addition to Clause 21.04 “...A mix of high, medium and low density development areas is expected to accommodate potential housing demand while retaining the township’s character and amenity.”

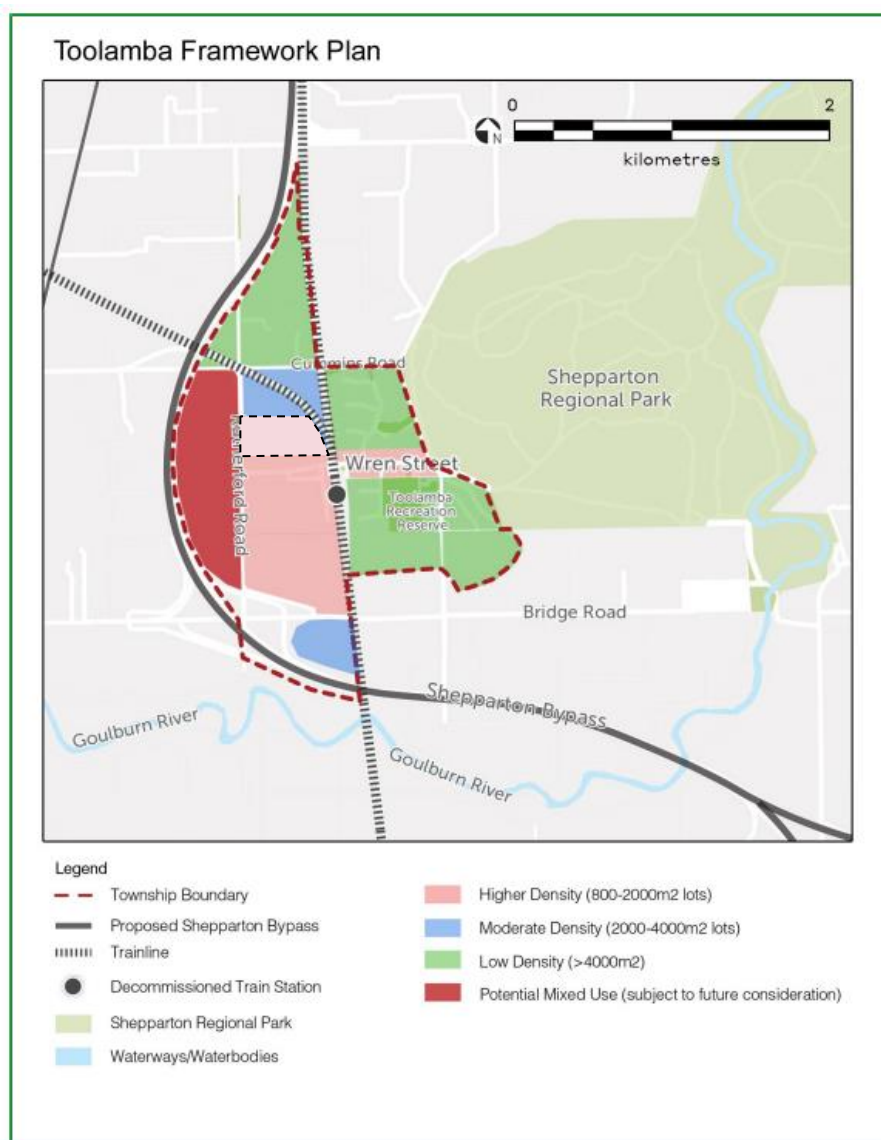


Figure 5 Suggested Amendment to Toolamba Framework Plan, Clause 21.04 Greater Shepparton Planning Scheme

Area to be included for High Density Lots

7. RELEVANT PLANNING POLICY

The following section provides a response to the relevant Clauses of the Greater Shepparton Planning Scheme to demonstrate the strategic consistency of the submission.

SETTLEMENT

7.1 The following clauses are relevant to this submission:

- ▶ Clause 11.01-1S Settlement seeks “to promote the sustainable growth and development of Victoria and deliver choice and opportunity for all Victorians through a network of settlements”.
- ▶ Clause 11.01-1R Settlement – Hume contains a strategy to “Support growth and development in other existing urban settlements and foster the sustainability of small rural settlements.”
- ▶ Clause 11.02-1S Supply of urban land seeks “to ensure a sufficient supply of land is available for residential, commercial, retail, industrial, recreational, institutional and other community uses.”
- ▶ Clause 11.02-2S Structure planning seeks “to facilitate the orderly development of urban areas.”
- ▶ Clause 11.02-3S Sequencing of development seeks “to manage the sequence of development in areas of growth so that services are available from early in the life of new communities.”
- ▶ Clause 11.03-6S Regional and local places seeks “to facilitate integrated place-based planning.”

7.2 The request made by this Submission will contribute to the orderly growth pattern in Toolamba by providing residential development within the existing Toolamba settlement boundary in the short term.

7.3 It will also provide for additional moderate density living opportunities in Greater Shepparton.

7.4 Given its abuttal of existing residential development, and proximity to a range of community services and facilities, including a school and recreational areas, the subject site provides a logical location for the moderate density residential expansion of Toolamba.

ENVIRONMENTAL RISKS AND AMENITY

- 7.5 The following clauses are relevant to this submission:
- ▶ Clause 13.04-1S Contaminated and potentially contaminated land seeks “to ensure that potentially contaminated land is suitable for its intended future use and development, and that contaminated land is used safely.”
- 7.6 A contamination assessment has been undertaken and found no reason to prevent the site’s residential development.

BUILT ENVIRONMENT AND HOUSING

- 7.7 The following clauses are relevant to this submission:
- ▶ Clause 15.01-6S Design for rural areas seeks “to ensure development respects valued areas of rural character.”
 - ▶ Clause 16.01-1S Integrated housing seeks “to promote a housing market that meets community needs.”
 - ▶ Clause 16.01-2S Location of residential development seeks “to locate new housing in designated locations that offer good access to jobs, services and transport.
 - ▶ Clause 16.01-4S Housing affordability seeks “to deliver more affordable housing closer to jobs, transport and services.”
- 7.8 The subject site is capable of supporting development which is consistent with existing residential development patterns and character of Toolamba, whilst accommodating the wastewater disposal requirements of the site.
- 7.9 A moderate density residential outcome is appropriate for the rural context and existing development pattern of Toolamba.
- 7.10 The layout of the development will respond to the existing features of the site, including the lay of the land, the railway line and the vegetation features so as to provide a good urban design outcome.
- 7.11 The size of the site, available points of access and large lot sizes allow lots to be appropriately orientated to attain the best solar access outcomes for each dwelling.
- 7.12 Additional land available for low/moderate density will contribute to the provision of options for housing and meet the community demand for low density residential development.

DEVELOPMENT INFRASTRUCTURE

- 7.13 The following clause is relevant to this submission:
- ▶ Clause 19.03-2S infrastructure design and provision seeks *“To provide timely, efficient and cost-effective development infrastructure that meets the needs of the community.”*
 - ▶ Clause 19.03-3S Integrated water management seeks “to sustainably manage water supply, water resources, wastewater, drainage and stormwater through an integrated water management approach.”
- 7.14 A Land Capability assessment has been undertaken and the findings have been incorporated into the design of the subdivision.
- 7.15 If the future development of the subject site is required to be connected to reticulated sewer, the identification for lots of 800m² may assist with the feasibility of the development of land whilst still maintaining a low density residential outcome for the land.
- 7.16 The site will be connected to reticulated water, electricity, telecommunications and stormwater drainage infrastructure. Wastewater disposal can be accommodated onsite.

LOCAL PLANNING POLICY

- 7.17 The following clauses are relevant to this submission:
- ▶ Clause 21.04-1 Urban Consolidation and Growth contains key elements of the Growth Management Plans from the GSHS incorporated into a series of Framework Plans, including Toolamba and states *“it is important that growth is maintained on a number of fronts, providing choice and variety in the housing market and accommodating projected population growth over at least a 15 year period”*.
 - ▶ Clause 21.05-1 Natural Environment and Biodiversity seeks “to maintain and enhance biodiversity of native flora and fauna communities, protect and manage the natural resources of water, air and land, identify natural landscape features which are to be protected and managed and ensure planning for residential and rural residential growth provides for biodiversity protection and enhancement measures”.
 - ▶ Clause 21.05-2 Floodplain and Drainage Management seeks “to recognise the constraints of the floodplain on the use and development of land.”
- 7.18 Providing for the development of the subject site in the short term will contribute to choice, options and variety for the housing market in Toolamba and provide for additional supply of housing in response to growing demand.

- 7.19 The subject site is largely unconstrained and can be developed without adverse impacts on natural environmental features. The scale and location of flood risk at the site has minimal impacts on development capacity at the site.
- 7.20 The designation of the subject site for Short Term will allow Toolamba to meet short term demand in a manner which is most appropriate with regard to location, servicing, land capability and desired character.

8. CONCLUSION

8.1 This Submission has outlined the suitability of the subject site for residential development.

8.2 It is the preference of the landowners to develop the subject site in the short term for approximately 50 lots each of 3,000m² or above.

8.3 However, in event reticulated sewer services become available and the site must connect to these services, the development of only 50 lots of 3,000m² will not be feasible. It is therefore requested the designation be provided to allow flexibility of lot sizes and yield to provide a feasible development to the market.

8.4 It is respectfully requested the Panel give favourable consideration for the Toolamba Framework Plan to be amended to designate the subject site as “Higher Density and Moderate Density” as shown in Figure 5 for the following reasons:

- ▶ The subject site is within the existing settlement boundary.
- ▶ This designation will allow the development of the site regardless of whether reticulated sewer services are available, or the development density is informed by a Land Capability Assessment.
- ▶ The subject site is strategically located to provide for the logical expansion of residential development within Toolamba.
- ▶ A Land Capability Assessment has demonstrated wastewater can be contained on site.
- ▶ The proponents have undertaken much research into this development and based on this research will provide a housing type much preferred and demanded in Toolamba.
- ▶ The provision of moderate density allotments on the subject site will provide for housing choice and diversity, particularly to that proposed for Investigation Area No. 6, thereby fulfilling the State and local policies of providing a variety of growth fronts and housing choice.
- ▶ A range of housing and streetscape typologies can be incorporated into the development layout to ensure the existing and preferred character of Toolamba is respected and reinforced.
- ▶ The subject site is in close proximity to Toolamba town centre and a variety of community services.

- 8.5 The Framework Plan has only designated one growth front within Toolamba for short term development despite there being a recognised shortage of supply, the current unavailability of reticulated sewer in Toolamba and a willingness of our clients to develop the subject site in the short term.
- 8.6 For these reasons, it is respectfully requested the Toolamba Framework Plan as exhibited be amended by:
- ▶ designating the subject site for a mixture Higher and Moderate Density, and
 - ▶ designating the subject site for Short Term Growth to provide an additional growth front for Toolamba.