

Draft PRECINCT STRUCTURE PLANS
LOCKERBIE, LOCKERBIE NORTH, MERRIFIELD WEST
NORTHERN GROWTH CORRIDOR
SUBMISSION TO GROWTH AREAS AUTHORITY

SUBMISSION BY THE MERRI CREEK MANAGEMENT
COMMITTEE



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1.0 INTRODUCTION

This submission is made by the Merri Creek Management Committee (the Committee).

The Committee has briefly reviewed the draft Precinct Structure Plans (PSPs) for the Northern Growth Corridor which lie within the Merri catchment in the municipalities of Hume, Mitchell and Whittlesea. These are the Lockerbie, Lockerbie North and Merrifield West PSPs.

The Committee's comments are focused primarily on matters of biodiversity, open space, cultural heritage and waterways.

The Committee's concerns relate to the impacts of urban development on the Merri Creek, its environs and associated biodiversity, landscape, cultural and amenity values.

The submission contains four main elements:

1. an overview of the Committee's role and functions;
2. a general discussion of matters pertaining to all three PSPs;
3. a discussion of the Lockerbie PSP;
4. a very brief discussion of the Lockerbie North and Merrifield West PSPs.

2.0 MERRI CREEK MANAGEMENT COMMITTEE INC

2.1 Background

The Merri Creek Management Committee (MCMC) is an environmental coordination and management agency formed in 1989 to achieve the shared vision for the Creek held by the stakeholders in the Merri Creek catchment.

The Committee is an incorporated association whose members include all of the municipalities in the catchment, namely: the Darebin, Hume, Moreland, Whittlesea and Yarra City Councils plus Mitchell Shire Council; the Friends of Merri Creek and the Wallan Environment Group. Representatives of these member groups form a Committee of Management which guides the Committee's activities.

The primary purpose of the Committee is:

"...to ensure the preservation of natural and cultural heritage, and the ecologically sensitive restoration, development and maintenance of the Merri Creek and tributaries, their corridors and associated ecological communities"

The key activities of the Committee include:

- Coordinating the policies, works and activities of member groups.
- Carrying out revegetation and remnant vegetation restoration works at more than 80 sites along the Creek and its tributaries between Wallan and the Yarra.
- Providing environmental planning advice to member Councils and developers.
- Involving the community in managing the Creek and its parklands.
- Educating the community about environmental issues.
- Seeking funds and grants to support Merri Creek programs.
- Negotiating with government on key issues.

The Committee has an annual budget of approximately \$1.3 million and employs 14 full time and 6 part time staff.

2.2 Merri Creek and Environs Strategy

A key policy document for the Committee is the Merri Creek and Environs Strategy 2009-2014. The Merri Creek and Environs Strategy is a document intended to give direction to managers of the waterway corridors of the Merri catchment. As the title indicates, it has a strategic intent; however it also captures some important, often site-specific actions, which underpin its strategic direction.

All six Councils in the Merri catchment have formally adopted/endorsed the Merri Creek and Environs Strategy at Council meetings.

2.3 Familiarity with the PSP areas

The Committee is familiar with the Merri Creek catchment, the Merri Creek and its tributaries, and to a greater or lesser extent with the specific PSPS areas. The Committee's knowledge includes specific experience of on-ground biodiversity and natural area management, experience in strategic planning for waterway and biodiversity values, and a comprehensive understanding of the impacts of urban development on biodiversity and waterway values.

In the Lockerbie PSP area the Committee has and is:

- undertaking on-ground biodiversity management works for private landholders including implementation of Commonwealth Caring for our Country grants ;
- produced a Wildlife & Habitat Guide for Merriang Landholders;
- participated in the development and implementation of the Merriang Local Area Biodiversity Action Plan together with the Merriang Landcare Group¹.

In the Kalkallo Township area immediately adjacent to the Lockerbie PSP, the Committee has produced a Vegetation Management Plan for the Kalkallo Common and is undertaking on-ground biodiversity management works at Kalkallo Common (North and South). The Committee has also advised the Donnybrook Cemetery Trust on biodiversity values and management needs of native vegetation within the Cemetery area.

In relation to the Lockerbie North PSP area the Committee has close familiarity with immediately adjacent areas including:

- the Beveridge – Wallan Rail Reserve for which a Vegetation Management Plan has been prepared and where on-ground vegetation management works have been undertaken;
- the Beveridge Spring St Recreation Reserve (and swamp) for which a Vegetation Management Plan has been prepared and where on-ground vegetation management works have been undertaken.

The Committee has less direct experience of the Merrifield West PSP area but is nevertheless familiar with the site characteristics, the role of the Kalkallo Retarding Basin, Yarra Valley Water's Kalkallo Stormwater Harvesting project, and the values and management needs of the adjacent Mt Ridley Grassy Woodland Reserve. The Committee was involved in discussions surrounding the planning scheme amendment for the Merrifield Employment area.

2.2 Response to Growth Corridor Plan

The Merri Creek Management Committee has made a submission to the draft Northern Growth Corridor Plan and draft Biodiversity Conservation Strategy and the comments made on the PSPs are made in the context of the wider submission and the concerns raised therein.

¹ In these instances the 'Merriang' area includes properties in Donnybrook and Kalkallo

3.0 GENERAL COMMENTS

3.1 Out of Sequence Planning

Merri Creek Management Committee is concerned that the PSPs for Lockerbie, Lockerbie North and Merrifield West have been presented for public comment prior to finalisation of the Growth Corridor Plan (GCP) and the Biodiversity Conservation Strategy (BCS). The final form of these two documents could have a significant bearing on the detail of the PSPs. In their draft form, these documents have a number of inconsistencies with the PSPs. This is particularly the case for the Lockerbie PSP.

3.2 Need for Independent Review

The Committee is concerned that the PSP amendments do not include a public review process and requests that the three Amendments be referred by the Minister for Planning to an independent Planning Panel review. This should occur subsequent to the approval of the final Growth Corridor Plan and the Biodiversity Conservation Strategy.

Planning Panel Review Needed *The Merri Creek Management Committee recommends the Minister for Planning refer the Lockerbie, Lockerbie North and Merrifield West PSPs to independent review by Planning Panel.*

Further, the Committee recommends that these reviews not take place until the Growth Corridor Plan and Biodiversity Conservation Strategy have been finalised.

The Committee considers the following matters are of concern across all three PSPs:

1. The inadequate response of the PSPs to biodiversity values;
2. The incomplete response of PSPs to open space and recreation opportunities;
3. The incomplete response of PSPs to Aboriginal cultural heritage matters and to historical sites;
4. The inadequate requirements for managing the impacts of waterquality and hydrology on waterways and biodiversity;
5. The lack of an integrated approach in the PSPs to providing for biodiversity values, Aboriginal cultural heritage protection, open space passive recreation and drainage/water quality control.

The specifics of these matters are explored in the case of the Lockerbie PSP.

In addition the Committee has serious concerns about the location of the proposed Lockerbie Principal Town Centre, a matter discussed in our submission on the GCP and the BCS.

4.0 LOCKERBIE PSP

4.1 Inconsistencies between GCP/BCS and PSP

- The extent of the narrowed area for Growling Grass Frog (GGF) habitat is much greater in the PSP than in the BCS. In the PSP the GGF corridor is narrowed for the entire length of Merri Creek; the narrowest reach, 50m wide either side, extends for approximately twice the distance indicated in the GCP (~1.6km vs 0.8km). The Committee opposes any narrowing of the GGF corridor from a minimum 200m either side of Merri Creek.
- The location of major north-south arterial road in the vicinity of Donnybrook Rd. The GCP shows the intersection of this road with Donnybrook Rd to the west of Merri Creek, rather than to the east as shown in the PSP. The former location avoids an additional crossing of Merri Creek. The Committee strongly prefers the location of the north-south arterial road to the west of Merri Creek, as shown on the GCP.

Retain 200m wide Growling Grass Corridor either side of Merri Creek Merri Creek Management Committee opposes the reduction in width of the Merri Creek Growling Grass Frog habitat corridor. Further, the Committee notes that the PSP proposes an even more extensive narrowing of the corridor than does the Growth Corridor Plan.

Locate north-south arterial road in accordance with GCP Merri Creek Management Committee supports the southerly location of the north-south arterial road to the west of Merri Creek, in accordance with the Growth Corridor Plan, rather than the location to the east of Merri Creek shown on the PSP.

4.2 Proposed removal of Merri Creek ESO

The Committee opposes the removal of the Merri Creek Environmental Significance Overlay (ESO)² and believes that key objectives of the ESO are not adequately addressed by the PSP. The PSP includes a 'Creek Environment Character Precinct' and refers to its function as a 'green spine' and to the need to retain its environmental, biodiversity and landscape elements. However it fails to articulate the desired landscape and recreational characteristics of the creek corridor, as expressed in the Merri Creek ESO, and in doing so, proposes adjacent landuses that will undermine the landscape and recreation use objectives of the ESO.

The Merri Creek ESO includes a comprehensive range of environmental objectives. Its key landscape and recreation objectives include:

Landscape Character

- *To protect and enhance the natural and visual character of the waterway corridor.*

² The numbering of the Merri Creek schedule to the ESO differs between municipalities, e.g. ESO2 in Hume, ESO3 in Whittlesea.

- *To ensure that the scenic qualities and visual character of the waterway corridor are not compromised by the inappropriate siting of buildings, the placement of fill, or lack of screening vegetation.*
- *To restore those sections of the waterway corridor which have been modified to create artificial bed, banks and landforms to a more natural, visually attractive and ecologically diverse landscape.*

Recreation Use

- *To create a peaceful, passive open space quality in the creek parkland and valley.*

Natural Systems

- ***To restore and revitalise the creeks and adjoining open space to a more natural and ecologically diverse environment.*** (emphasis added)
- *To ensure the health and vitality of the natural systems of the creek and its associated open space.*
- .
- *To provide for retention, restoration and revegetation of local native species.*

The PSP's description that 'Merri Creek will be framed by strong built form outcomes on each side' and may include medium and high density residential, office buildings, mixed use developments and so on (p.30, Creek Environment Character Precinct) is at odds with the ESO objective for a peaceful open space quality for recreation use. This is particularly the case for those sections of the creek where the Growling Grass Frog corridor is proposed to be only 50m wide and where passive recreational use will of necessity be largely confined to the edge of the GGF corridor. This length of creek corridor extends for approximately 1.8km and the recreational experience, in very close proximity to high density, high use urban areas and bordered by roads, will be far from peaceful.

Section 4.4 of this submission addresses those aspects of the Native Vegetation Precinct Plan which allows destruction of native vegetation within the Merri Creek corridor. This provision is contrary to the intent of the ESO.

Retain Merri Creek ESO *Merri Creek Management Committee opposes the removal of the Merri Creek ESO. The PSP does not adequately reflect the objectives of the ESO.*

4.3 Kalkallo Township Interface

The Lockerbie PSP borders two sides of the existing Kalkallo Township area but largely ignores this area and its interface, and worse, undermines biodiversity values in this area.

Road intrusion into Kalkallo Conservation Area: The key intrusion is the apparent location of an east-west arterial road on the alignment of a road closure overlay within the Kalkallo township. This road closure overlay area is identified in the SMEC Biodiversity Mapping report

as an area of high conservation value, part of the wider Kalkallo Common/Kalkallo Cemetery³ conservation area.

A further 'intrusion' into the Kalkallo Common/Cemetery area is the PSP's indication of an east-west connector road linkage running between the Kalkallo Common and the Cemetery. Whilst this road currently functions as a minor road, it only provides access to one property and in the longer term its use should be limited to maintenance access for the combined Kalkallo Common/cemetery conservation reserve identified in the draft Biodiversity Conservation Strategy.

Similarly, a north-south connector road leading from Donnybrook Rd appears to be located on the eastern edge of the Kalkallo Township area, again on a road closure overlay and in part within the existing conservation reserve of Kalkallo Common South.

Need for management and community-access areas at the interface to Kalkallo Conservation Area Irrespective of the precise location of the north-south and east-west roads, there is no indication that the interface areas with the Kalkallo Common have been given any design consideration. An appropriate interface, and appropriate width of space, is needed both for biodiversity management requirements and in places to allow for appropriate low level, informal community use in the vicinity of the conservation reserve.

Remove inappropriate road intrusions into Kalkallo Common/Cemetery conservation area. Merri Creek Management Committee opposes road intrusions into the Kalkallo Common (north and south) and Cemetery area. Further, appropriate interfaces to allow for biodiversity management and low-level community use are needed.

4.4 High value biodiversity and Aboriginal cultural heritage areas

The Committee notes that the PSP area contains a number of areas of high conservation value, including Plains Grassy Woodland and Stony Knoll Shrubland, the majority of which is identified for removal/destruction⁴. This includes areas within the Merri Creek corridor and areas contiguous with the Kalkallo Common/Cemetery (e.g. HZ42, HZ40 & HZ92).

It is especially disturbing to see stormwater wetlands and Growling Grass Frog habitat ponds proposed for areas within the Merri Creek corridor of high conservation value native vegetation.

These areas (of native vegetation identified for removal) represent lost opportunities to enhance the conservation reserves of Merri Creek and Kalkallo Common and to create an east-west habitat linkage from the Kalkallo Common to Merri Creek incorporating many of the Stony Knoll Shrubland areas. Such a linkage is recommended in the SMEC Biodiversity Report (p.v.)

Stony Knolls The stony knolls, in particular, represent an easily identifiable characteristic of the volcanic landscape and have a direct geological and landscape relationship to Bald Hill, an eruption point (volcano) and origin of the lava flows which produced the stony knolls.

³ The correct name for the 'Kalkallo' Cemetery is the Donnybrook Cemetery, despite its location in Kalkallo. It contains important biodiversity values and is also an historical site.

⁴ According to the Lockerbie Native Vegetation Precinct Plan (Nov 2011) Approximately 90% of the remnant vegetation in the PSP area is allowed to be destroyed and offset.

Furthermore, stony knolls/rises are identified as areas of Aboriginal cultural heritage sensitivity, surpassed in sensitivity only by Merri Creek⁵.

A redesign of the location of public open space could utilise these high value areas and thus provide:

- biodiversity benefits;
- opportunities for local community to engage with nature, including, for example, nature areas adjacent to local schools;
- retention of significant local landscape features of the volcanic plain to assist in achieving a unique character for the PSP area;
- protection of Aboriginal cultural heritage.

Protect high conservation value vegetation within Merri Creek corridor Merri Creek Management Committee recommends that as far as possible all high conservation value vegetation within the Merri Creek public open space and GGF corridor be protected. The Native Vegetation Precinct Plan should be amended to show this vegetation as 'to be protected'. In particular stormwater and Growling Grass Frog wetlands and other infrastructure should be located so as to avoid remnant native vegetation.

Protect high conservation value vegetation contiguous with Kalkallo Common/cemetery Merri Creek Management Committee recommends that high conservation value vegetation contiguous with Kalkallo Common/Cemetery be protected to enhance the value of the Kalkallo conservation reserve.

Protection of stony knolls/rises Merri Creek Management Committee recommends that the majority of the stony knolls/rises that contain native vegetation be protected for their biodiversity, landscape and Aboriginal cultural heritage value.

Create an east-west conservation/landscape linkage between Kalkallo Common and Merri Creek Merri Creek Management Committee recommends an integrated approach to the redesign of public open space to create a conservation/landscape linkage between Kalkallo Common and Merri Creek that provides biodiversity, landscape, Aboriginal cultural heritage and community engagement benefits.

⁵ Webb C. & Walker J. (2011) Lockerbie Project, Kalkallo Precinct Structure Plan Cultural Heritage Assessment p.19. Likewise the Cultural Heritage Assessment for the Lockerbie North PSP notes a strong association between Aboriginal cultural heritage and stony rises (A. Light, 2011, p.14).

4.5 Aboriginal Cultural Heritage

As noted above, the Cultural Heritage Assessment has identified Merri Creek and stony rises as the areas of highest sensitivity for Aboriginal cultural heritage. The Committee notes that this assessment was largely a desktop assessment and that on-ground surveys will be needed to more fully understand the Aboriginal cultural heritage of the PSP area. The Committee considers it essential that these investigations, and a Cultural Heritage Management Plan, be completed before the PSP planning is taken any further.

Undertake Cultural Heritage Management Plan before proceeding further with PSP planning Merri Creek Management Committee strongly recommends that a Cultural Heritage Management Plan be completed before PSP planning proceeds any further.

4.6 Drainage and flood mapping

The Committee notes that Melbourne Water is yet to verify mapping for the 1:100 ARI flood event for the PSP area and that the Drainage Strategy acknowledges that the drainage reserve area at the southern end of the PSP is inadequate⁶. It is essential that this information is finalised and integrated into the planning for open space before the PSP is finalised.

As noted above, the Committee is alarmed that the indicative location of various retarding basins/wetlands coincides with high conservation value native vegetation areas.

The Committee is also concerned to ensure that the drainage strategy acknowledges the hydrological sensitivity of the Kalkallo Common (north), an 'outlet' point for sub-catchments within the PSP. Two indistinct flow paths/drainage lines traverse the Kalkallo Common and the current pre-development hydrological regime has played an important role in ensuring suitable conditions for a number of species associated with the low-lying gilgai areas of the Common. Of particular note is the remnant population of Murnong (Plains Yam Daisy) in the Common. There are now very few locations on the Victorian Volcanic Plan that support this once widespread species, a staple food in earlier times for Indigenous people. The presence of Murnong at Kalkallo Common is known to the Wurundjeri Council and is culturally valued by Elders who have participated with the Committee's staff in survey and land management activities for this and other species.

It is essential that the pre-development hydrological regime be maintained/replicated in order to ensure the protection of biodiversity values within the Kalkallo Common, especially the Gilgai areas that include Murnong. This is not simply a matter of containing the 1:100 ARI flood event, as per current Melbourne Water requirements, but requires a detailed approach to ensure post-development flows through the Common replicate as far as possible the pre-development pattern. This may require specialised design of the retarding basin proposed for the area immediately to the north of the Common in order to detain flows that exceed the pre-development level.

Finalise drainage and 1:100 flood requirements Merri Creek Management Committee recommends that drainage and 1:100 flood mapping requirements and associated 'drainage' reserves be finalised and integrated into open space planning before the PSP is finalised.

⁶ Lockerbie Property, Kalkallo Draft Surface Water Management Plan, May 2011, Engeny Water Management, p.14

Ensure pre-development hydrological regime for Kalkallo Common is maintained Merri Creek Management Committee recommends a pre-development hydrological regime be maintained for the drainage lines through the Kalkallo Common be in order to ensure biodiversity protection.

4.7 Stormwater treatment

In a number of its previous submissions on growth area planning the Committee has emphasised the inadequacy of the current stormwater treatment requirements of Clause 56 in protecting stream health

The Committee's key concern is that urbanisation leads to deterioration in water quality and to major changes in hydrology (pattern of stream flow), both of which lead to degradation in stream health.

Water Quality Even full compliance with Clause 56 does not ensure that water quality in newly urbanised areas is as high as the pre-development rural condition. Both the *Better Bays and Waterways* water quality plan⁷ and Melbourne Water's *Waterways Water Quality Strategy*⁸ identify the need to review the performance objectives of the Best Practice Stormwater Guidelines to better protect waterways. Furthermore, Clause 56 only applies to residential subdivisions. An equivalent clause is needed for industrial, business and mixed use zones.

Hydrology The only regulatory requirement for hydrological performance of new urban areas is that they not increase the downstream flood risk above the previous rural condition for a 1:100 flood event. However the increased amount and frequency of runoff from smaller rain events can be just as degrading to stream health as the decrease in water quality. Water sensitive urban design (WSUD) can mitigate these effects but the current Clause 56 does not have a flow frequency objective. The *Waterways Water Quality Strategy* identifies the need to update the best practice objectives with flow frequency and erosion potential objectives.⁹

Establish improved stormwater quality and hydrology objectives to ensure protection of stream health and Growling Grass Frog habitat Merri Creek Management Committee recommends that PSPs require an improved level of stormwater management, beyond the requirements of Clause 56, to ensure water quality and hydrology of waterways is maintained at pre-development levels, in order to protect Growling Grass Frog and other waterway values.

4.8 Lockerbie Principal Town Centre

In its submission on the Northern Growth Corridor Plan, the Committee discussed its opposition to a Principal Town Centre straddling Merri Creek in the Lockerbie/Donnybrook North area, in conjunction with a new railway station. These concerns are principally because of the potential

⁷ *Better Bays and Waterways – A Water Quality Improvement Plan for Port Phillip and Western, Melbourne Water and EPA Victoria, 2009.*

⁸ Melbourne Water (2008) *Waterways Water Quality Strategy.*

⁹ *Ibid.* Appendix 1, p.21

and actual impacts on the Growling Grass Frog and other Merri Creek environmental values and on the Bald Hill, Donnybrook Conservation Area.

As mentioned in section 4.2, the Committee also considers that recreational experience of the creek corridor will be diminished if high density landuses are located in close proximity to Merri Creek, i.e. as proposed in the PSP where the creek corridor is greatly narrowed and high density uses abut small, unencumbered passive open space areas.

Biodiversity impacts

As discussed earlier, the PSP proposes a significant narrowing of the Category 1 – Growling Grass Frog (GGF) habitat area. The reach in the vicinity of the Principal Town Centre is narrowed the most. The Committee considers it is critical to maintain the habitat function of this stretch of creek. The proposal to narrow the 200m width to 50m is incompatible with Growling Grass Frog conservation and threatens to sever the link between the GGF populations around Donnybrook township and that in the Bald Hill area.

Further, the Lockerbie PSP indicates high intensity uses are planned for the land adjacent to the narrowed corridor – high density residential, rail station and car park, commercial, regional active open space, and a 6-lane east-west arterial road. These uses will produce a range of impacts on the Growling Grass Frog and other creek biodiversity values from noise, light, and cat predation (see Ecology & Heritage Partners GGF Technical Report, p.94).

The Bald Hill Conservation Area is adjacent to the proposed Principal Town Centre, immediately to the north and west of the railway line. This area has many biodiversity values and the Committee is concerned about the impacts of high-intensity uses adjacent to the Conservation Area including recreational pressures (e.g. walking and bike path construction), noise, lights, rubbish dumping and litter.

The Committee does not have an in-principle objection to a town centre located to the west of Merri Creek, providing a very substantial (greater than 200m wide) open space corridor buffers the creek from the town centre. However the Committee strongly objects to a Town Centre which straddles Merri Creek and which leads to a narrowing of the open space corridor from a minimum 200m either side.

The Committee notes that the draft Lockerbie PSP shows the core town centre (retail anchors on Main Street) located from 800m to well over 1km from the proposed station. This is well beyond easy walking distance and seems at odds with the objective to locate the Principal Town Centre around a railway station.

The transport study for the Lockerbie PSP (Parsons Brinckerhoff, 2011, p.5) identifies several other options for rail stations to serve the Lockerbie community. The options include: the existing station at Donnybrook, a re-instated station at Beveridge, and a future station on the OMR rail line.

Ensure minimum 200m open space/habitat corridor between any town centre and Merri Creek

The Committee recommends that a minimum 200m open space/habitat corridor be maintained between Merri Creek any town centre located to the west of Merri Creek. Such a town centre should be restricted to the west, it should not straddle Merri Creek.

Relocation of the Donnybrook/Lockerbie Principal Town Centre

Mitigation measures will have limited effect in reducing the major biodiversity impacts of the proposed siting of the Principal Town Centre and in view of this, the Committee believes that alternative locations for a Principal Town Centre for the Northern Growth corridor should be pursued, including options based around new rail infrastructure designed to specifically service the highly fragmented Northern Growth Corridor.

Alternative locations could include Beveridge. The 'Hume Highway Corridor' has been identified as the preferred option for the Canberra – Melbourne leg of the High Speed Train Alignment¹⁰ and Beveridge has been identified as a potential 'peripheral station' for the High Speed Train network, because of its proximity to the OMR¹¹. If Beveridge were to become a 'peripheral station' for the High Speed Train network, this could provide a suitable focus for a Principal Town Centre.

The Committee is concerned that neither the Growth Corridor Plan nor the PSPs make mention of, or provision for, High Speed Rail Infrastructure. This is a matter which should be urgently attended to in order to avoid foreclosure of options.

Relocate the Donnybrook/Lockerbie Principal Town Centre away from Merri Creek and Bald Hill Conservation Areas *The Committee recommends that alternative locations for a Principal Town Centre be pursued to avoid the unacceptable impacts of the Donnybrook/Lockerbie Principal Town Centre..*

5.0 LOCKERBIE NORTH AND MERRIFIELD WEST

The Committee has not been able to review the Lockerbie North and Merrifield West PSPs in any detail but notes that a number of the limitations and concerns identified for the Lockerbie PSP also apply to these PSPs, in particular the lack of integration in planning for the range of biodiversity, waterway, landscape, cultural heritage and open space values.

Comments on drainage, hydrology and stormwater treatment are also highly applicable to all PSPs.

¹⁰ AECOM High Speed Rail Study Phase 1, July 2011 p.136. Report released by the Australian Minister for Infrastructure and Transport. Available at: http://www.infrastructure.gov.au/rail/trains/high_speed/index.aspx

¹¹ Ditto p. 56.