

Thank you for the opportunity to make a presentation in support of our submission regarding Plan Change 54. We greatly regret that we are unable to attend today's hearing. We are away at a family reunion, which was booked some time prior to being notified of the date of the hearing. Please do not mistake our non-attendance as apathy towards the proceedings; we are deeply invested in the outcome of this hearing.

You will recall our submission was to oppose Plan Change 54 in its entirety. The chief concerns outlined in our submission were:

- Unnecessary urban creep into arable land
- Sufficient Living zoned land to fulfil current and forecasted population requirements
- Questionable demand for larger section sizes within Springfield
- Higher building density than suggested in the application
- Reverse sensitivity effects with respect to the bordering honey factory and dairy farm
- Possible detrimental environmental effects
- Loss of rural amenity and character for current Springfield landowners.

We have read the Officer's Report on Submissions relating to Plan Change 54. Frankly we were disappointed with the lack of regard for our chief concern: the fact of unnecessary urban creep into productive arable land. In fact, despite this issue being raised by a number of submitters¹ as well as ourselves, the report only mentioned this point once in a very superficial way.

6.9 *"The submitter concerns regarding landscape change are linked to wider concerns expressed regarding the shape and identity of Springfield township. Such sentiments are expressed through concerns about urban sprawl, **the loss of productive farmland**, and the decline in a clear sense of cohesion and village character."*² [Emphasis added]

Loss of productive farmland is not a sentiment. It is a fact that as urban areas spread into productive arable land, food has to be produced elsewhere, or in a different manner. This results in a number of negative impacts:

- increasing off-shore food production
- increasing transport costs as food production moves further away from main centres
- increasing intensification of farming
- farming in less productive or marginal soils, further damaging fragile ecosystems.

The Council clearly acknowledges that the application site is productive land. The Malvern Area Plan 2031 identifies that one of the key disadvantages of developing the application site is that:

*"The land is comprised of Class III versatile soils, which are valued for their productive capacity."*³

¹ Nicky Snoyink, Roger Radcliffe

² Report on submissions relating to Plan Change 54, pg 12

³ Malvern Area Plan 2031, pg 108

In the Officer's Report on Submissions relating to Plan Change 54, it was stated that:

6.2 *The key matters **either raised by submitters, or necessary to be considered in ensuring that the Council's statutory functions and responsibilities are fulfilled**, [emphasis added] are:*

- *Effects on the township form, character, and amenity of Springfield;*
- *Infrastructure servicing (water supply, sewer, and stormwater);*
- *Transport safety and efficiency;*
- *Land stability and geotechnical risk;*
- *Soil contamination risk;*
- *Potential adverse reverse sensitivity effects;*
- *Potential for industrial development;*
- *Cultural values.*⁴

It is astounding that loss of productive farmland was not deemed to be a key matter in the report. As previously stated it was raised by a number of submitters, and is a vital aspect of the Council's function and responsibility. Indeed, some of the key principles in developing the Malvern Area Plan 2031 include:

- *preserving rural productivity*
- *sustainably managing our rural and natural resources*
- *environmental responsiveness.*⁵

Plan Change 54 is not in line with these principles. Retaining valuable arable land to feed the population is surely a higher priority than the questionable goal of providing an alternative property size to a select few. We consider the plan to develop 16 residential units on 30 hectares of good food producing land to be a frivolous waste of a precious resource.

We were somewhat curious as to why the report gave no credence to the loss of arable land as a serious issue. And then we realised: other concerns about views, amenity or loss of rural character can be brushed over, clarified or mitigated in some way, however there is no possible argument that refutes the fact that if Councils continue to allow productive rural land to be rezoned to residential, food production will have to occur elsewhere. Councils need to carefully consider our future and major impacts such as climate change and fuel crises/shortages, which will impact food production in our lifetime. Long term there will be a requirement to produce food locally, however this will not be possible without land.

When we first purchased land in Springfield in 2005, it was an undersized rural block. Over the next ten years we proceeded to buy three other neighbouring properties, in an effort to acquire a useable parcel of arable land and to ensure that this was not carved up into lifestyle blocks. We believe it is important for the Council to look towards the future and do its part in safeguarding our ability to grow food locally.

We urge the Commissioner to uphold the opposing submitters concerns and decline this plan change in its entirety.

Thank you for the opportunity to be heard on this submission.

Peter & Pamela Aldersley

⁴ Report on submissions relating to Plan Change 54, pgs 10, 11

⁵ Malvern Area Plan 2031, pg 13