

19 November 2020

Laura Wilks
Coordinator of Strategic Planning
Golden Plains Shire

(Via email : amendments@vpa.vic.gov.au)

Dear Laura,

Response to the Proposed Bannockburn Growth Plan

We write on behalf of a of the landowner of land at [REDACTED], Bannockburn to seek inclusion of the land within the 'proposed growth boundary' the Framework Plan and identified as 'future growth option - east' in Plan 1, Framework Plan, Plan 5, Proposed Growth Areas, and subsequent plans and figures within the exhibited Bannockburn Growth Plan.

We submit that the Growth Plan creates an obvious anomaly and a land use conflict by not identifying the subject land for a future growth option consistent with the direction for growth of the proposed eastern boundary of Bannockburn south of the Ballarat railway line.

We believe that the Growth Plan will benefit from the identification of this land for future integrated growth as it will provide a logical land addition to establish a consistent eastern boundary with land to the south which will result in an orderly planning outcome for Bannockburn.

Site and Surrounds

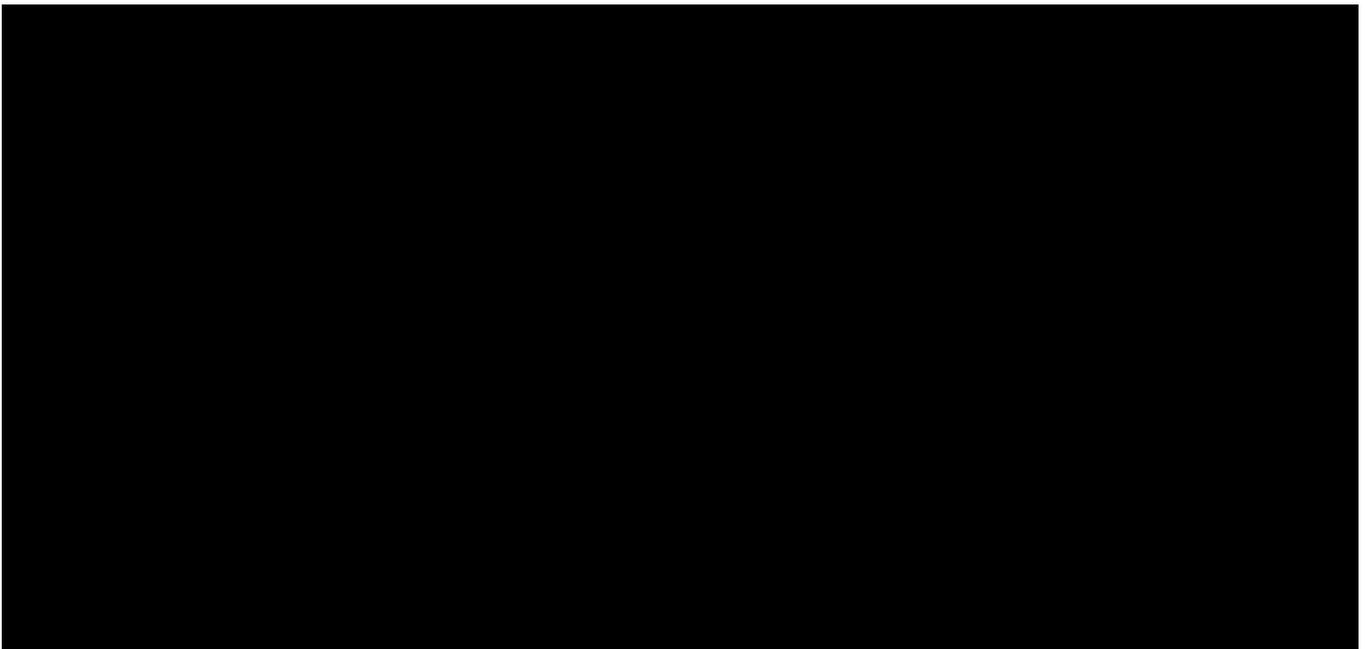
The subject land consists of two parcels known as [REDACTED] and [REDACTED], with both parcels being within the Farming Zone and abutting existing Low-Density Residential Zone land immediately to the west. The land is situated approximately [REDACTED]





AERIAL OF SUBJECT LAND

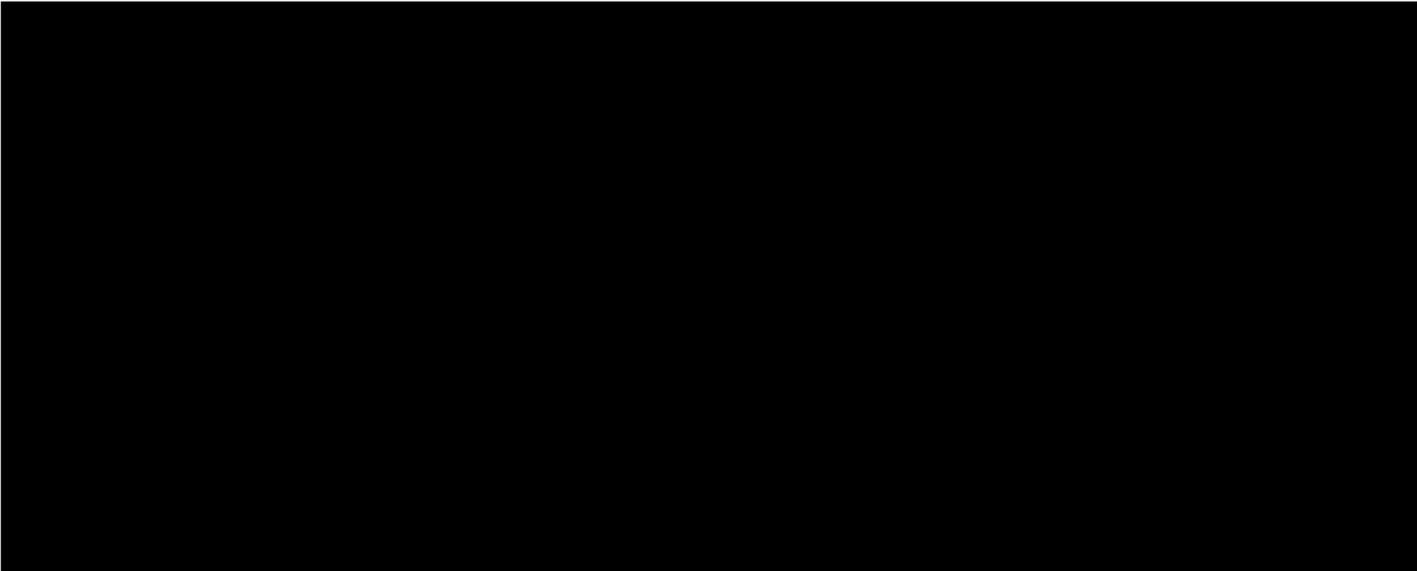
Land on the opposite site of the Midland Highway is included within the Rural Activity Zone with the majority of lots containing improvements including dwelling, outbuildings, shedding and fencing. The Ballarat Railway Line is situated immediately to the south of Lot 2. All land to the south and east is included within the Farming zone and used for limited agricultural activities. Land immediately to the west and north-west are included within the Low-Density Residential Zone, with land to the north-west containing a newly constructed residential estate, while the parcel immediately to the west is currently undeveloped.



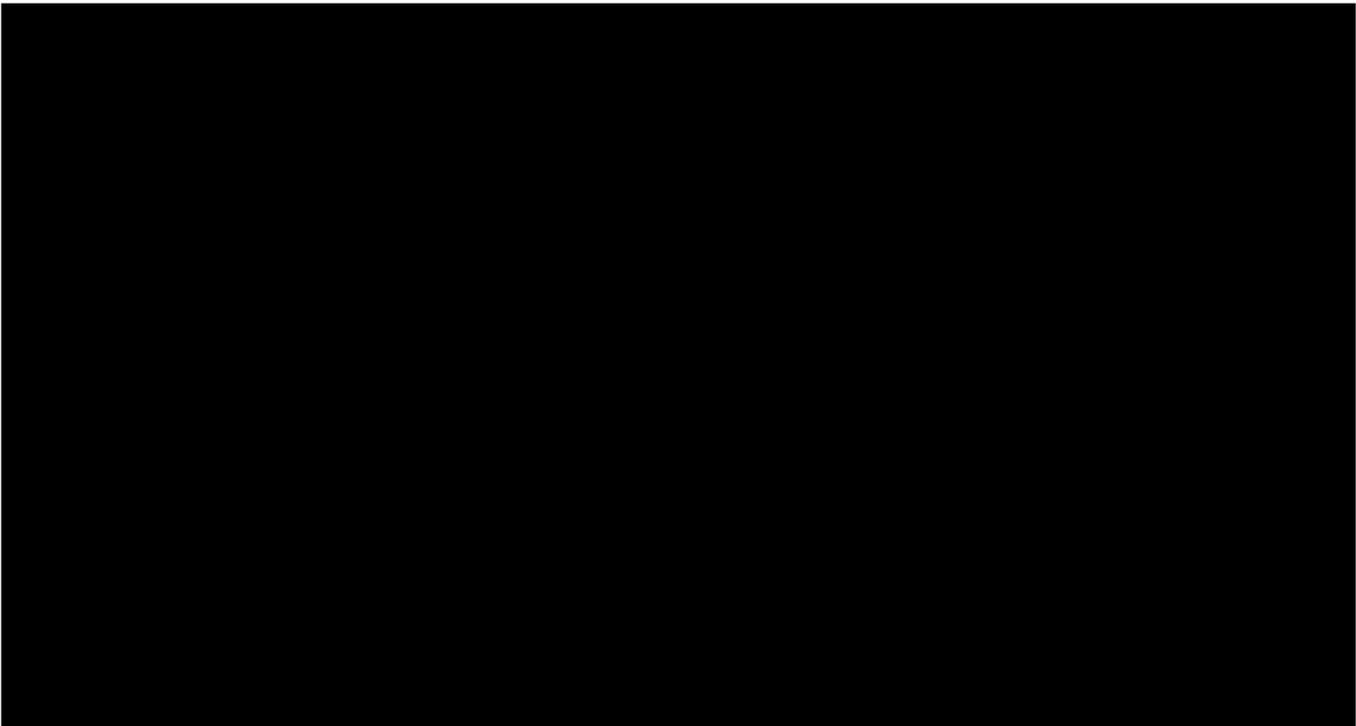
ZONING MAP



Lot 1, which currently contains an existing dwelling and associated outbuildings to the east of the site, is approximately 16.8 hectares in area. Vehicle access to the Midland Highway is gained via a service road. This service road also provides access to the [REDACTED], immediately to the north of Lot 1.



Lot 2, which is currently vacant of structures, is located immediately to the south of Lot 1, and is approximately 72.1 hectares in area. No formal constructed vehicle access to the Midland Highway currently exists for Lot 2. A dam is situated central to the site with a low-lying area to the east impacted by the Land Subject to Inundation Overlay and Salinity Management Overlay.

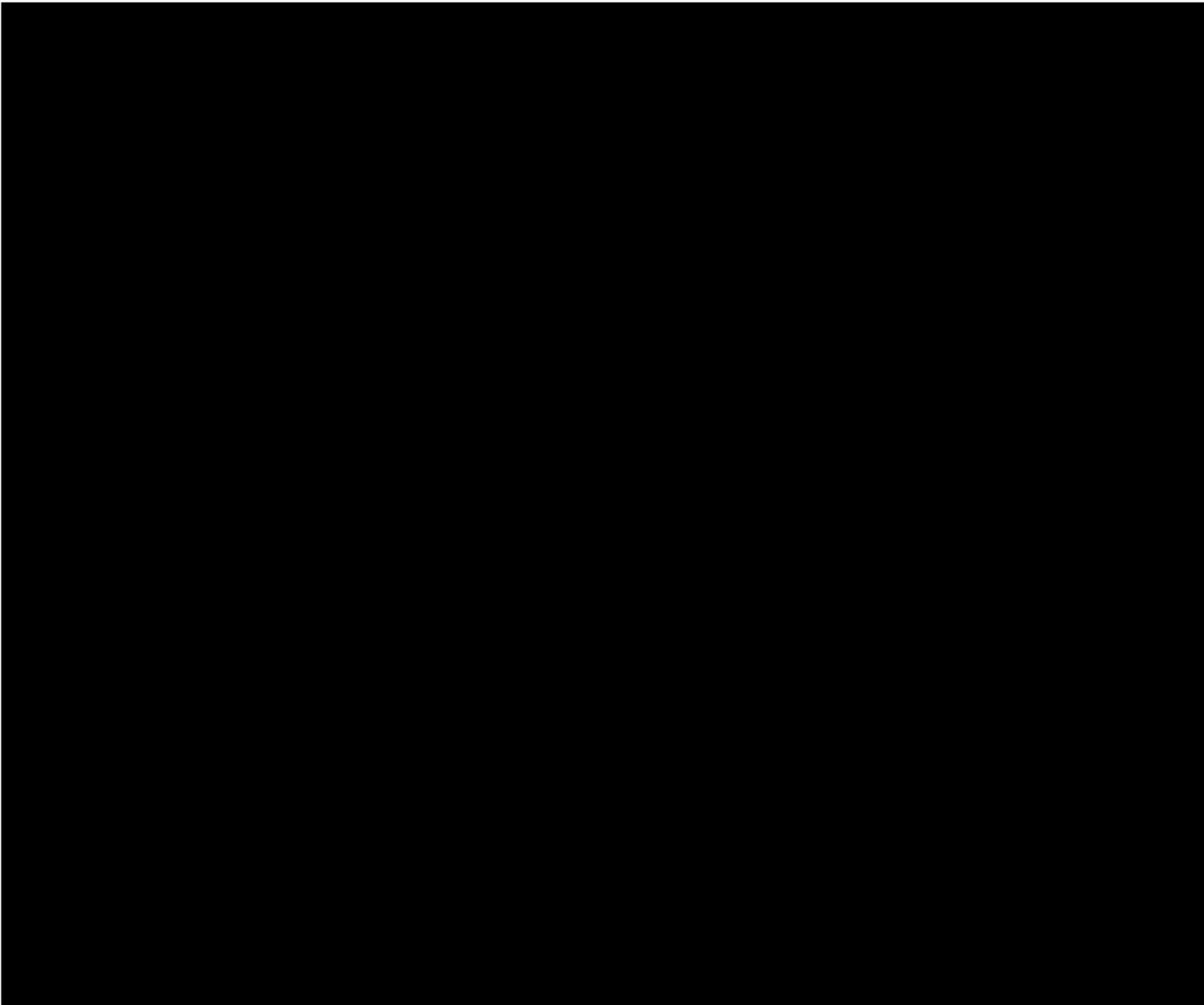


Both parcels of land are currently used for agricultural purposes.



Area proposed to be included in Bannockburn Growth Boundary

The aerial below of a revised growth boundary shows part of the subject land, approximately 36 hectares, proposed for inclusion in the Bannockburn Growth Boundary. The land is substantially located outside the Gheringhap buffer and south of the Midland Highway and thus will avoid development adjoining this road corridor. The land also adjoins existing Low Density Residential land to the west and is located to the north of the proposed eastern extension of the Bannockburn Growth Boundary. The proposed extension avoids an area that is subject to inundation to the east and illustrates how its inclusion will generally accord with the proposed eastern extent of the Bannockburn Growth Boundary.

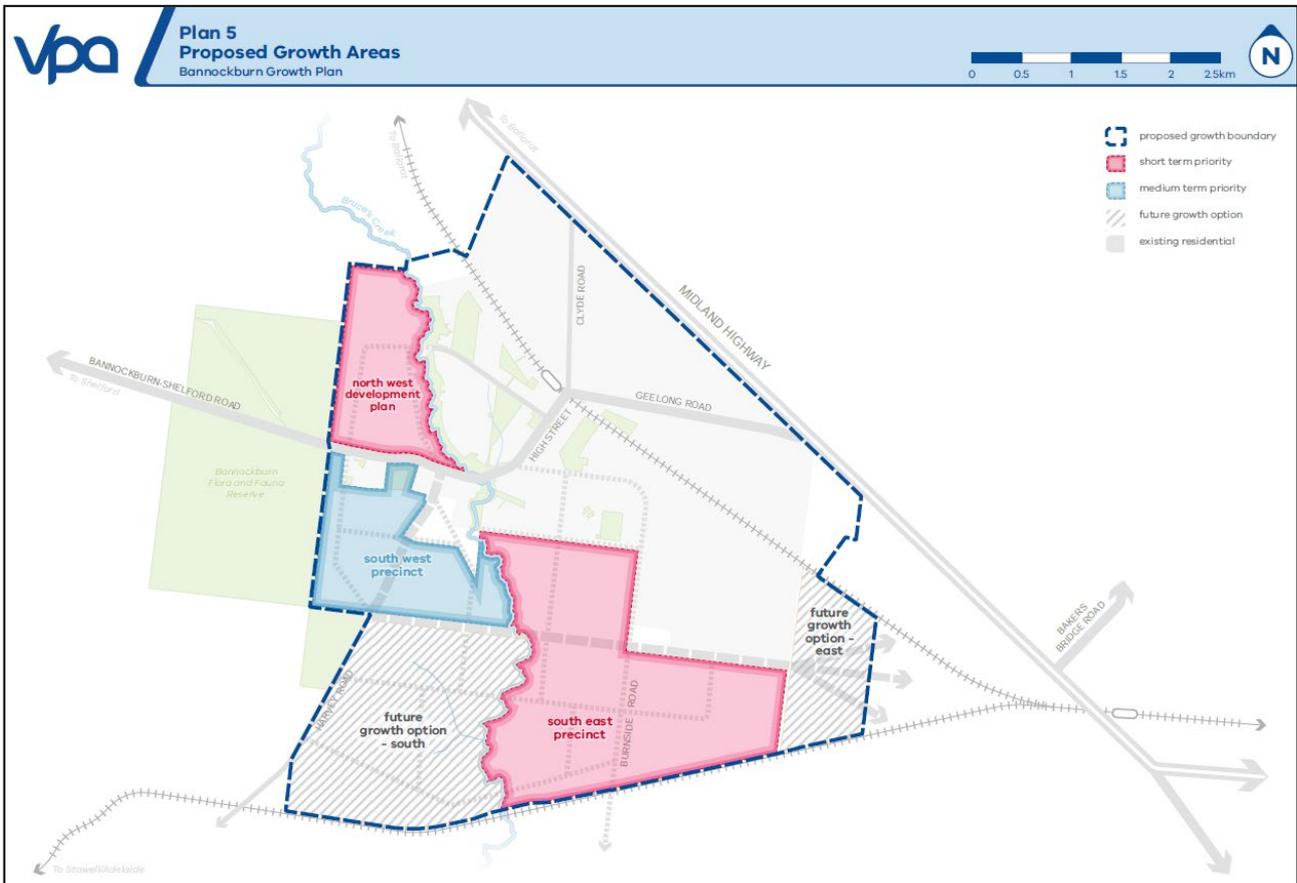


- - - Subject Land - - - Proposed Growth Boundary - - - Revised Proposed Growth Boundary

AERIAL OF PROPOSED REVISED GROWTH BOUNDARY

Bannockburn Urban Growth Plan

The Bannockburn Urban Growth Plan has been developed to set the future strategic direction and vision for the development of Bannockburn. The Growth Plan is based on high level investigations of the towns future growth needs and the likely areas proposed to facilitate this growth in the future. The Growth Plan also provides the Strategic Planning merit to substantiate future rezoning applications for Bannockburn.

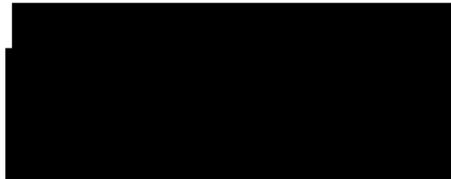


PLAN 5, GROWTH AREAS – BANNOCKBURN GROWTH PLAN

Plan 5 illustrates the areas proposed for short-term and long-term growth areas, some of which are already identified in the current framework plan. The Plan also indicates future growth options south and east of Bannockburn, which either adjoin short term development areas or existing developed areas, therefore they will in the future provide a logical extension of the towns residential and rural living areas. The proposed future growth option east indicates the eastern most extension of proposed future urban growth boundary between the Ballarat and Adelaide railway lines. This area is located just south of the subject land.

We support the addition of the future growth options as this appropriately seeks to facilitate additional growth should high lot demand prevail. These additional growth options are also important as all the growth areas identified in Plan 5 have finite boundaries and are unlikely to ever be extended past the Bannockburn Growth Boundary. The growth options north-west and south-west adjoin the Bannockburn Flora and Fauna Reserve which not only restricts any future westerly extension, but will require the establishment of a sensitive interface adjoining this reserve. Similarly, the south-east precinct area bounded to the south by the Adelaide/Melbourne railway line and expansion further south-west will likely result in the loss of valuable farming land and impact nearby farming operations.

These areas are also likely to be encumbered by environmental issues, particularly those areas that adjoin the Flora and Fauna Reserve and Bruce Creek, which are also likely to require buffers to protect the integrity of these features. This in turn will impact the development capacity of these areas and are likely to reduce the expected lot yield.



As such, further detailed planning is required to assess each urban growth area and the opportunities and constraints that ultimately determine the actual lot yield. Therefore, at this time the lot forecast is aspirational until this further work is completed and thus it is vitally important that all appropriate land additions that have the capacity to be developed are recognised in this Plan which we understand is likely to endure as the overall Framework Plan for Bannockburn for many years.

Another important consideration which we note is not addressed in each of the development areas, is the importance to maintain and integrate urban development with the existing neighbourhood character of Bannockburn. We believe this issue is vitally important to preserve the endemic character of Bannockburn and raise concerns that areas that have been subject to previous Precinct Structure Plans have a sameness about them that would not accord with the character of Bannockburn. It is likely however to achieve this goal that lot densities and subdivision design whilst adopting contemporary standards need to reflect the Bannockburn character which may involve, in some areas, lower density development when compared to Geelong and Melbourne, as is the prevailing character of Bannockburn.

Thus, in addition to environmental considerations, lot density will also influence the future yield of these areas. We believe therefore that it makes planning sense to ensure that all the land that could be logically included within the growth boundary has been identified as an option for future growth, particularly if development targets are only general in nature. We acknowledge though this should be restricted to the addition of land adjoining the current town boundary and land substantially unencumbered by environmental constraints. The addition of the subject land will assist in achieving this aim.

We also believe that the creation of the future growth boundary should not result in land use issues which may hamper the use of the adjoining land. Thus, it makes sense that this remaining area of land along the eastern boundary which includes the subject land be incorporated within the growth boundary.

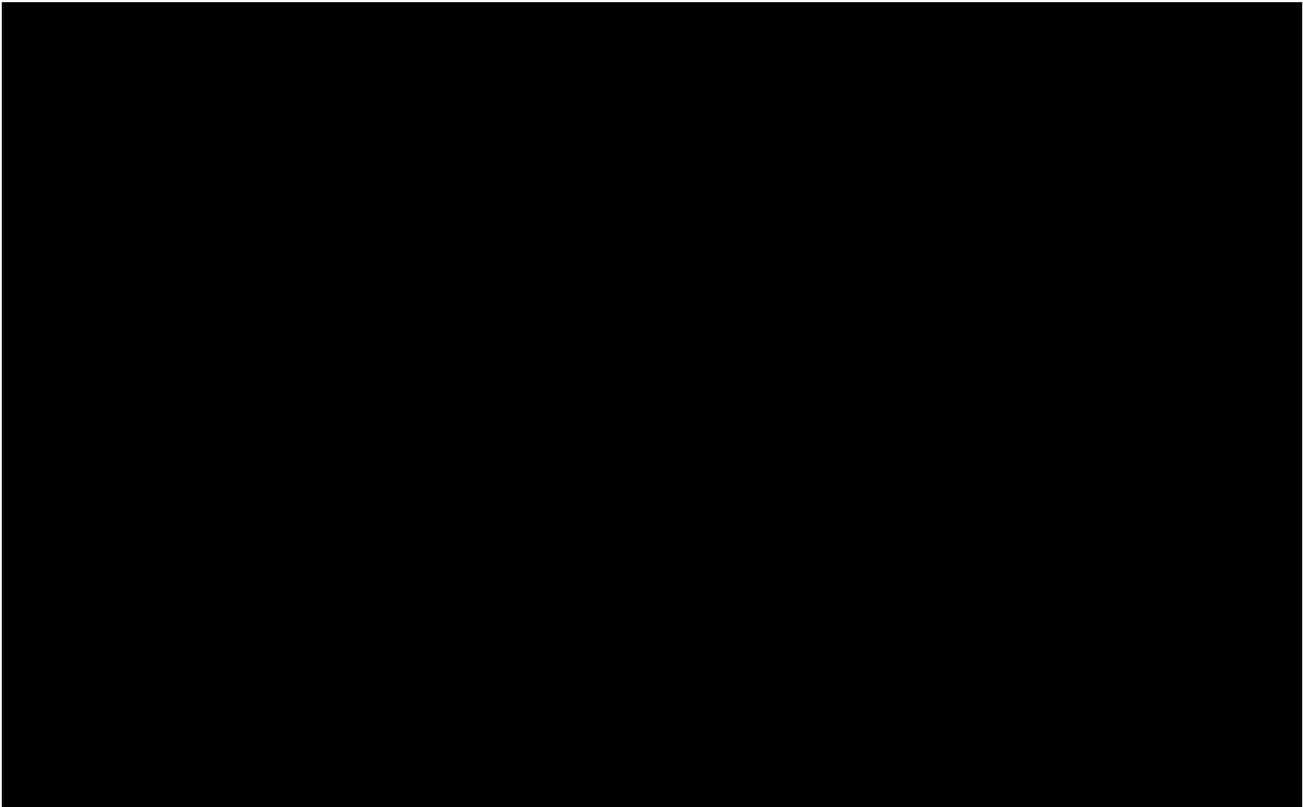
It is also important that this land is recognised now for inclusion in the Bannockburn Growth Plan as this planning process represents the appropriate route to consider any logical additions now and avoid potential consideration and amendments in the future.

Urban Growth Direction

The subject land provides a logical urban growth addition considering its location adjoining the eastern boundary of Bannockburn, which also aligns with the likely growth boundary extension to the south identified as 'future growth option - east'.

The subject land is already impacted by the adjoining developed land to the west and will be further impacted in the future by the potential development of the land to the south. This is in addition to the rail and road infrastructure that already detrimentally impact the use of this land for farming purposes. Thus, the land will be significantly impacted by urbanisation and the future development of Bannockburn.

This will further marginalise this land for farming use and render the land completely unviable.



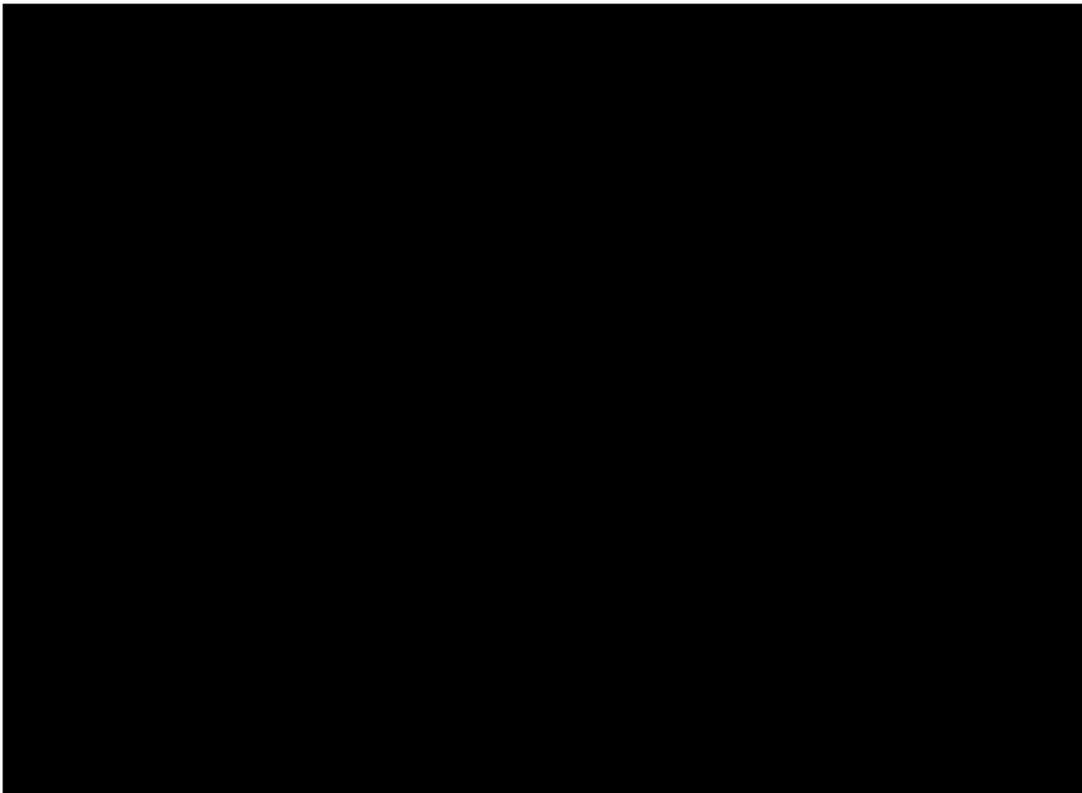
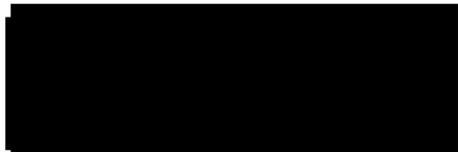
REVISED PLAN 1, FRAMEWORK PLAN – BANNOCKBURN GROWTH PLAN

Figure 3 – Growth Plan Investigation Area (below)

This plan highlights a number of areas in red and identifies them as constrained. This includes area 5 which is identified as a ‘non-urban break between Gheringhap and Bannockburn’ which we submit is firstly not a constraint and secondly given the size of this buffer and the location adjoining the buffer from the proposed employment uses at Gheringhap, it is hard to justify.

Particularly as the urban development of this land is likely to be Low Density Residential Development and thus is unlikely to have any substantial visual impact on this area as evident along the Midland Highway boundary west.

Also, the area designated for this buffer is not visually sensitive and is not identified as a significant landscape feature and as advised due to its size and location, is unlikely to make any meaningful contribution in preserving the rural landscapes of this area. We believe the inclusion of a visual buffer over this short distance beside an industrial buffer is not substantiated. However, the subject land can still be included in the Growth Boundary and also maintain this visual buffer if it is ultimately required.



REVISED FIGURE 3, GROWTH PLAN INVESTIGATION AREA – BANNOCKBURN GROWTH PLAN

Summary of Logical Inclusion benefits

In addition to the response already provided, the following outlines in brief the benefits of identifying the subject land for future growth in the Bannockburn Growth Plan.

> Integration and Contiguous Zone Opportunities

The identification of the subject land as a future development option will provide an opportunity to establish a contiguous extension of Bannockburn in an integrated manner and the efficient use of infrastructure and build on and add value to the existing and growing community.

> Potential Loss of High Value Farm land

Any future rezoning of the subject land will not result in the loss of high quality economically sustainable farming land. This is primarily due to the lot size which is not large enough to produce a viable commercial farming product. In addition, with the advent of development to the south this will further reduce the farming viability of this land.

> Potential contamination

As the site has been used for rural living it is unlikely to contain contaminants that would be unsuitable for future residential development. This can be demonstrated via an assessment by a qualified consultant when required.



> Flora and Fauna

The subject land is unlikely to contain as significant species given its consistent farming history.

> Servicing

The subject land is ideally located to enable integration opportunities with the emerging and future development areas of Bannockburn. The land is only a short distance from central Bannockburn where community and commercial facilities are all available.

> Economic Benefits

The future addition of the subject land will also provide an additional economic boost and support for the commercial services that have both been established and will continue to emerge as part of the development of Bannockburn.

> Catchment considerations

There is now considerable interest and assessment required to determine the impacts of a new development on the surrounding catchments from a water quality and quantity perspective. There is also a reluctance by the drainage authorities to allow new development in new catchment areas that remain substantially undeveloped. Therefore, we submit that existing developed catchments should be areas where new development can occur to avoid environmental and potential flood impacts on undeveloped catchments.

> Impact on the Current Process

We submit that the identification of this land as requested in the Growth Plan is a positive addition that does not create any impost or detriment to this process or this area of land east of Bannockburn.

> Advantages

The advantages of recognising the subject land for future urban growth are numerous in terms of allowing time to undertake an orderly planning and development process to ensure the seamless uninterrupted supply of residential growth land and importantly to provide housing diversity and competition to ensure a competitive housing market that meets the housing needs of the growing Bannockburn community. These advantages we believe will continue the positive work already undertaken by Council in embarking on this process.

We would be happy to discuss this matter further.

If you have any queries please do not hesitate to contact 

Yours sincerely,



