

23 November 2020

Victoria Planning Authority
c/- Emily Killin
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Submission to the Bannockburn Growth Plan

Thank you for the opportunity to make a submission in relation to the Draft Bannockburn Growth Plan.

[REDACTED], on behalf of our client, [REDACTED] are pleased to provide the following submission in response to the Draft Bannockburn Growth Plan (**Growth Plan**).

In general terms, our client supports the approval of the Growth Plan, including the 'vision', 'principles' and 'themes', however there are some concerns regarding specific elements that are identified in the Growth Areas and shown on the Framework Plan that are outlined in this submission that we seek be addressed.

Importantly, we believe that our requested changes will further improve the Growth Plan's ability to guide change, provide flexibility in design at the precinct structure plan or development plan stage and most importantly encourage continued investment into the area.

This submission relates to the 'Background Studies' and 'Public Consultation Documents', including the Growth Plan and Planning Scheme Ordinance, that are available on the VPA's website and seeks to outline each issue of concern and a requested change we believe will enhance the deliverability of the Growth Plan.

Subject Properties

[REDACTED] have substantial land holdings in the north-west, south-west and south-east Growth Areas.

Property 1 - [REDACTED]
[REDACTED]

Property 2 - [REDACTED]
[REDACTED]

Property 3 - [REDACTED]
[REDACTED]

All land parcels are well placed to accommodate future urban development and are shown on the following map.

[REDACTED]

[REDACTED]

[REDACTED]

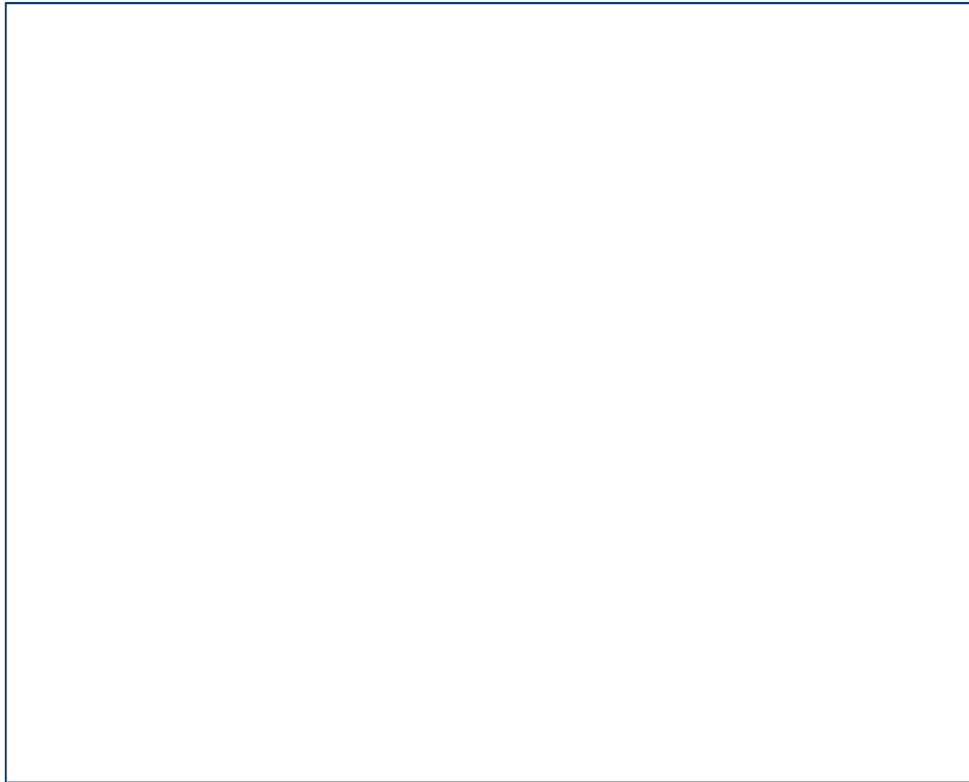


FIGURE 1: PLAN 1 - FRAMEWORK PLAN

Planning Submission

This submission is provided in two (2) parts by referencing to the proposed Planning Scheme Ordinance and the Draft Bannockburn Growth Plan, 2020.

Whilst it is understood that the Growth Plan will be a Background Report referenced in Clause 72.08 of the Planning Scheme it is important that at the commencement of its reference in the Planning Scheme that it is as refined as possible.

The key themes of the matters that we wish to raise can be generally categorised as follows:

- Inclusion of land directly adjacent the north west boundary in the North-West Development Plan area which is cleared of vegetation and part of a contiguous land holding;
- Remove the 'future industrial expansion' from the South-West Precinct and encourage growth of the Gheringhap Employment Precinct;
- Relocate the 'future retail centre' further east towards Burnside Road to provide a stronger link to the existing community and maximise the surrounding catchments;
- Remove references to the size of the 'future retail centre' to allow further assessment to occur at the PSP stage;
- Encourage 'off road' bike network that links the Bruce Creek corridor, Bannockburn Reserve and Transmission line corridor;
- Provide clear direction that the arterial road alignment is indicative only;
- Provide clear guidance that bridge locations are indicative only; and
- Provide clear direction that the waterway corridor width is indicative only.

For ease of review, reference is made to the relevant Planning Scheme Ordinance or Growth Plan section that applies to these key themes.

Planning Scheme Ordinance

Our client supports the inclusion of the Growth Plan as a Background Report that is referenced in the Schedule to Clause 72.08 of the Planning Scheme. This allows for changes to the Growth Plan to occur, if required or as more detailed information becomes available, without requiring a planning scheme amendment.

Further, our client supports the **Framework Plan (Plan 1)**, within the Growth Plan, being included in Clause 02.04 – Strategic Framework Plans, of the Planning Scheme. This allows appropriate referencing to occur in the other ordinance that are proposed to be updated.

The Amendment seeks to make changes to the Strategic Directions and Strategic Framework Plans include in Clause 2 – Municipal Planning Strategy.

There is an opportunity to further strengthen the Housing directions by specifically referencing the updated growth areas shown on the Framework Plan and enhance the strategic relevance of the Growth Plan.

Requested Change

Insert the following in Clause 2.03-6 Housing, Council will:

- **Encourage urban development within the designated growth areas shown in the Bannockburn Growth Plan (2020)**

Clause 02.03-7 Economic Development (Industry) states (amongst other things):

'A number of industrial sites in the north of the Shire established to provide land for industrial use and development remain vacant. This reveals that a significant proportion of small-scale industrial uses are located within town areas largely due to historic reasons and operator preference. The remaining industrial zoned land is within inappropriate or non-preferred areas or may lack necessary infrastructure. There is also competition for industrial land provided by the larger urban areas of Geelong, Ballarat and the Melbourne Metropolitan area.

The completion of the Geelong Ring Road has increased pressure for industrial land, particularly in the south-eastern area of the Shire'.

The 'Strategic Context' plan on Page 12 of the Growth Plan clearly highlights the importance and spatial benefits of the proposed Gheringhap Employment Precinct, which is located approximately 5 km south east of Bannockburn along the regionally important Midland Highway and Ballarat / western Victoria rail corridors.

It is currently stated at Clause 02.03-7 that, Council supports:

- Industrial development in areas that are strategically sound or identified for industrial development.

This strategic direction should be updated to specifically direct employment growth to the proposed Gheringhap Employment Precinct to ensure an integrated and fully serviced outcome can be achieved, in a location where potential adverse amenity buffers are of less concern.

Requested Change

Amend the current strategic direction in Clause 02.03-7 (Industry), Council supports:

- Industrial development in areas that are strategically sound or identified for industrial development, with a specific focus on the proposed Gheringhap Employment Precinct.

Clause 11.03-6L Bannockburn, applies to land within the Growth Plan. Numerous updates are proposed to this Clause which our client supports. However, as the planning process outlined on Page 15 of the Growth Plan continues there will be an increasing amount of technical data that will guide the land use planning outcomes and a need to ensure that development is staged in a way that ensures infrastructure is available to the new communities. For example, utility services may be available in an area well before others or there may be a need for multiple local town centres due to revised population estimates and demands.

We make the following requested changes that we believe ensure the appropriate level of flexibility can be maintained for future precinct structure / development planning processes.

Requested Change

Update Clause 11.03-6L to include:

A New Settlement Strategy:

Support urban development sequencing as detailed in the Bannockburn Growth Plan, 2020

Amend the wording of the proposed settlement strategy by stating:

- Provide a supplementary retail centre(s) generally consistent with the location shown in the Bannockburn Growth Plan.

Draft Bannockburn Growth Plan, 2020

The Growth Plan sets the strategic direction for urban development in the future. However, it will be the future preparation of precinct structure / development plans that will ultimately guide urban development.

This section outlines a series of 'recommended changes' to the Growth Plan that we believe can provide further guidance for the precinct structure / development plan processes.

Framework Plan

The Framework Plan is shown on Page 4 of the Growth Plan and will be included in Clause 02.04 Strategic Framework Plans within the Planning Scheme.

The Framework Plan map is an easy to reference guide of the land use outcomes that are generally expected however the detail of the background information that supports the Framework Plan is relatively high level. As such, it is important to ensure that appropriate notations are included on the map that allows for further refinement of the plan during the future precinct / development plan stages.

Further, the additional notations ensure that all parties, including relevant authorities / agencies, continue to be involved in future planning processes.

Requested Change

Include the following notations on Plan 1 Framework Plan.

- **The Framework Plan is a concept plan only that will be subject to change through the process of preparing Precinct Structure Plans for the precincts.**
- **The location of the arterial roads and bridges is indicative only.**
- **The location and width of waterway corridors is indicative only.**

Beyond the inclusion of the above notations we would recommend the following changes to the land uses identified in the Framework Plan:

- **Reduce the 'future industrial expansion' area to be immediate west only** (i.e. no expansion south of the existing industrial area).
- **Relocate the 'future retail centre' symbol further east** to maximise the walkable catchment areas

Vision

The vision is shown on Page 18 of the Growth Plan states (underline added).

'In 2050...

New residents and visitors are attracted to Bannockburn as a regional hub due to its distinct identity, affordable lifestyle and local amenity.

The community conveniently accesses the services, employment and education opportunities offered by regional cities via the re-instated passenger services on the Geelong-Ballarat rail line and improved bus connections.

Investment in road and path connections allow people and goods to move around the town and access surrounding urban centres with ease.

Local employment opportunities respond to the town's rural character through an enhanced agricultural sector and diverse industrial precincts.

Bannockburn's unique environmental assets are protected and enhanced, and places of cultural heritage significance safeguarded. Sustainable water use and management is at the forefront of decision making, and water quality in local sources is protected.

Bannockburn's built form is respectful of the natural environment and heritage values. New development responds to climate change by adopting Environmentally Sustainable Design (ESD) principles.

Underpinning the town's growth is a healthy and well-connected community.'

The reference to diverse industrial precincts is of concern. The existing industrial area located in the south west precinct has developed over a long period and take up of the land has been relatively slow.

The emerging reference to the proposed Gheringhap Employment Precinct, which is located on the major road and rail corridors and is in a superior location to the existing Bannockburn Industrial Precinct should be supported and reference of expanding the existing Bannockburn Industrial Precinct removed.

In a regional setting such as Bannockburn, supporting numerous industrial precincts is often to the detriment of all.

Requested Change

Amend the 'Vision' to replace the words '*...diverse industrial precincts*' with '*...the emerging Gheringhap Employment Precinct*'.

Principles

The seven (7) Principles are generally supported however we think there is an opportunity to achieve the outcomes envisaged under *Principle 4: Support a resilient local economy*.

Principle 4: Support a resilient local economy

In order to strengthen the local economy and support a greater percentage of local jobs there is a need to support an employment area that can establish the critical mass necessary to attract a diverse range of businesses.

Often the local employment areas become tired and fail to offer new opportunities for emerging businesses or have the land available to capture new opportunities.

The proposed Gheringhap Employment Precinct is located on the major transit and freight networks and is clearly directed to provide more local jobs to Golden Plains residents. Therefore, rather than diluting (all) the employment land by trying to spread to numerous areas across the Shire we believe greater focus should be placed on the new area rather than the old.

The existing Bannockburn Industrial Precinct could potentially accommodate some initial extension whilst the Gheringhap precinct is planned and established, however the existing Bannockburn industrial area already has stormwater management constraints so this growth should be limited to the area immediate west only. There is an existing street connection available to support growth in this direction.

Growth Areas

Bannockburn South East Precinct

The priority of the South East Precinct is supported.

It is acknowledged that at this stage the Growth Plan represents a high-level plan and refinement of urban structure, including waterways and the location of (arterial) roads, and land use distribution will be determined during the upcoming precinct structure planning processes.

Bannockburn North West Precinct

The priority of the North West Precinct is supported.

Whilst the North West Development Plan area was not included in the Investigation Areas we believe there is an opportunity to utilise some of the land directly north west of the precinct to assist in managing bushfire risk and accommodate other infrastructure such as roads or open space.

This land is cleared of vegetation and provides an opportunity to deliver a useful buffer to the heavily vegetated Bannockburn Reserve located to the west.

Bannockburn South West Precinct

The Framework Plan shows that this precinct includes a mix of residential and industrial land.

Our client has previously explored the opportunities associated with expanding the industrial precinct however the cost of upgrading (or creating) the necessary utility infrastructure has been prohibitive.

Given the difficulties in servicing the land for industrial purposes (i.e. drainage constraints) and the designation of the proposed Gheringhap Employment Precinct as the key industrial precinct for the Golden Plains Shire, we submit that the 'future industrial expansion' of the existing Bannockburn industrial precinct should be reconsidered.

As outlined previously, future industrial growth should be directed to Gheringhap along the major regional road and rail corridors, where the critical mass of development can be accommodated, and most importantly adverse amenity buffers contained.

The proposed 'future industrial expansion' area only extends approx. 200 metres south of the existing area and therefore could not reasonable accommodate any uses that require amenity buffers.

Themes

The Theme most relevant to our submission regarding changes to the land use designation contained on the Framework Plan is Theme 2: Economy & Employment.

Theme 2: Economy & Employment

The vision statement for Theme 2 states:

'Bannockburn will benefit from its strategic location and will build upon opportunities provided by its agricultural context and proximity to Geelong by encouraging investment in the Gheringhap Employment Precinct and the Golden Plains Food Production Precinct'.

The (relevant) Objectives outlined on Page 47 of the Growth Plan are:

- *Encourage investment in the Gheringhap Employment Precinct as a strategic location for regionally significant employment and economic growth.*
- *Plan for additional industrial land within Bannockburn that responds to local needs and considers potential amenity impacts.*

It is noted by these Objectives that the issues relating to the economic strength of the employment land and potential for adverse amenity issues are central to this Theme.

Clause 02.03-1 of the Planning Scheme states that:

'Gheringhap is situated approximately 15 kilometres north-west of Geelong and 6 kilometres south-east of Bannockburn. Gheringhap is close to major infrastructure including the Port of Geelong, Geelong Ring Road and the Midland and Hamilton Highways, which provide access between Geelong, Ballarat and the rest of Victoria. The town is well-positioned for business opportunities and future development of the Gheringhap Employment Area'.

Additionally, the policy states that:

Council seeks to:

- *Facilitate commercial and industrial development in the Gheringhap Employment Area as shown on the Gheringhap Structure Plan at Clause 11.03-6L Gheringhap.*
- *Locate and design commercial and industrial development to protect the amenity of the existing clusters of dwellings.*

Gheringhap is located on the Midland Highway which is the regional road connection (see Plan 2 of the Growth Plan) between Geelong and Ballarat as well as being at the junction of the two (2) railway lines that currently transport freight and produce to the Port of Geelong and beyond.

The Lethbridge agricultural precinct is also connected to Gheringhap by the Midland Highway.

Based on the concerns regarding potential adverse amenity impacts and the spatial strength of the Gheringhap employment precinct we believe that the focus for employment (industrial) land should be directed away from the Bannockburn Growth Area.

We trust the contents of this submission are clear however we look forward to working closely with the VPA and other land-owners to progress the approval of the Bannockburn Growth Plan.

If you have any queries, please contact me on [REDACTED] or [REDACTED]

Sincerely,

[REDACTED]