

[REDACTED]

Our ref: SP473806
Your ref: D/20/9934

25 November 2020

Mat Garner
Acting Director Regional Victoria
Victorian Planning Authority

Dear Mr Garner

Bannockburn Growth Plan and draft amendment to the Golden Plains Planning Scheme

Thank you for your letter to Alison McFarlane dated 26 October 2020 seeking the [REDACTED] comment on the draft Bannockburn Growth Plan (the Growth Plan) and draft amendment of Planning Policy Framework of Golden Plains Planning Scheme (the amendment).

[REDACTED] understands that the Victorian Planning Authority (VPA) in partnership with Golden Plains Shire Council has prepared the Growth Plan as a background document to guide the sustainable growth of Bannockburn township to the year 2050. The *Bannockburn Growth Plan Background Report* (October 2020) outlines information that supports the Growth Plan and draft amendment.

The amendment proposes to include the Growth Plan as a Background Document in Golden Plains Planning Scheme and make associated changes to the Planning Policy Framework (PPF). The Growth Plan relates to land within the existing Bannockburn township, in addition to a proposed expansion of the town growth boundary to the south. The amendment applies to land generally bounded by existing farming land and the Midland Highway to the north and east, the railway line to the south and the Bannockburn Flora, Fauna and Recreation Reserve to the west.

[REDACTED] has reviewed the Growth Plan and relevant details of the amendment and offers following comments:

1. Interface between Bannockburn Flora and Fauna and Recreation Reserve and future urban areas

The Growth Plan has identified the future development areas adjacent to the Bannockburn Flora, Fauna and Recreation Reserve, which is Crown land managed by the Ballarat Environment Network, a [REDACTED] appointed committee of management on behalf [REDACTED]. The Old Base Road reserve separates the Crown land from the two growth areas, namely North West development and South West precinct.

[REDACTED] notes the Growth Plan has made no reference to likely adverse effect on Crown land due to urbanization and the need to address those impacts on this land use. For example, the disturbance required for new infrastructure facilitate weed establishment, new dwellings creating artificial light and noise impacts, inappropriate changes to stormwater flows can affect flora values, as well as increases in vermin and roaming domestic pets associated with human habitation.

It is also important to consider that developments adjoining Crown land often leads to land management issues such as increased bushfire risk across both Crown land private

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landscape, as well as impacting biodiversity. In other cases, private land holders have created illegal accesses directly to the reserve, which leads to motorbikes, mountain bikes, dog walking and rubbish within conservation areas. This creates increased resource implications for the public land manager for compliance and enforcement programs, and potential risks to unauthorised users.

2. Water and Environment

- a) The draft plan identifies that “New constructed drainage waterway corridors will serve a flood mitigation function while also presenting an opportunity for habitat corridors and recreation connections for walking and cycling. Proposed drainage basins in the south of the growth areas present an opportunity to be linked as a new east-west linear park.” Any new drainage assets should be incorporated into the broader landscape and not integrated into existing waterways.
- b) Any new waterways and wetlands should be developed in accordance with the Melbourne Water Guidelines *Constructed Waterway Design Guidelines December 2019* to provide alignment with contemporary design and functionality not just for flood / storm water management but also for biodiversity values. These guidelines also bring in some of the policy response matters relating to *Water for Victoria* [REDACTED] around waterway health and protection of biodiversity related matters.
- c) Storm water management options should focus on the ability to retain water within the development area, either through retarding basins or Water Sensitive Urban Design responses including water reuse and increased permeability of surfaces to reduce the volumes of water leaving the site. The use of the existing waterways and wetland systems across the growth area should not be used as a solution to stormwater management within the areas of urban development.

3. Open Space

- a) There are a range of different types of open space within the growth area identified in the Growth Plan. Whilst accepting that the list may not be exhaustive, there is an opportunity to identify the potential to establish wildlife corridors across the area.
- b) An example of the opportunity to establish such a corridor is between the Bannockburn Flora, Fauna and Recreation Reserve, the Wabdallah Reserve, the Arboretum, local parks, and the Bruce’s Creek Corridor. This would need to consider the desirability for providing for the movement of larger species such as kangaroos and wallabies through an urban area but should provide for smaller species such as woodland birds to move across the landscape.

4. Greening

[REDACTED] has an interest in the planting of sympathetic street tree species within urban growth areas, particularly due to the historical issues with some species becoming environmental weeds. As such a list of species suitable for use as street trees should be developed, in consultation with Golden Plains Shire, to minimise future weed issues particularly to waterways and any adjoining environmental reserves and to enhance biodiversity connectivity across the site.

5. Bushfire

- a) The Bannockburn Flora, Fauna and Recreation Reserve is covered by the Bushfire Management Overlay which recognises the bush fire risk in the reserve and adjacent private allotments. It is important to understand that the prospect of creating higher density land uses will be restricted by the BMO area in the North West development and South West precinct.
- b) It is vital that urban development avoids a scenario where fire management / mitigation issues become restrictive more than any other land use and development constraints. Table 9, Page 61 of Growth Plan identifies the minimum separation distances between

rural and urban interfaces for bushfire management. These will need to include any fire mitigation measures such as the creation of firebreaks, vegetation management to be located outside of the reserve or other areas of ecological significance.

6. Buffers and Easements

- a) Buffers along Bruces Creek and other existing waterways need to be built into the design within the Growth Area to protect the values of these systems and allow for future enhancement of the sites. The waterway buffer design may follow Melbourne Water standards *Waterway Corridors, Guidelines for greenfield development areas within the Port Phillip and Westernport Region* (Melbourne Water, 2013).
- b) The Growth Plan area is within the Barwon Water management area, but the standards developed by Melbourne Water have been widely adapted and utilised by other water authorities and local governments as a standard for application in development areas and the provision of baseline information for decision making relating to the protection of waterways within development areas. As such it is appropriate that these standards are used in the development process.
- c) The Growth Plan acknowledges the potential presence of several threatened species within the area. It names some species listed under the commonwealth *Environment and Biodiversity Protection Act 1999* and state *Flora and Fauna Guarantee Act 1988*. The Growth Plan however does not acknowledge the presence of State and Commonwealth listed grassland communities being Western (Basalt) Plains Grassland and Natural Temperate Grasslands of the Victorian Volcanic Plain respectively.
- d) Survey of the site for the presence of threatened species and accompanying assessment of native vegetation within the area needs to be undertaken to identify future land use planning constraints. Whilst a lot of the area has suffered disturbance from agricultural practices it should not be assumed that biodiversity values, particularly grasslands don't exist, particularly along roadsides and where wetlands exist.
- e) The maps within the Growth Plan identify several wetlands or areas that potentially contain wetlands. In accordance with current *Guidelines for the removal, destruction or lopping of native vegetation* (██████████), areas shown on the ██████████ wetlands map are native vegetation and need to be protected by appropriate development control/overlay.
- f) The draft plan shows the nearness of Growth area to Bannockburn Flora, Fauna and Recreation Reserve. Any future development needs to provide appropriate buffers or interface treatment to the reserve to manage issues associated with weed incursion, domestic pets and other threats to the values of the reserve.

7. Sustainable Development

As part of the aim to achieve a 30% canopy cover across the Growth Area, there should be a consideration of whether and where any associated understory plantings may be able to be incorporated such as along around retarding / sedimentation basins, recreation reserves and nature strips. This would aim to enhance the biodiversity values of the area and promote local species and potential movement of native woodland birds and other small species of wildlife across the area.

8. Transport and Movement

The Growth Plan identifies a new roundabout on the Bannockburn-Shelford Road on the western side of the Growth Area. It is not clear if the road connecting in from the south is Old Base Road or Holder Road (plans 10 & 11). Old Base Road runs along the eastern side of the Bannockburn Flora, Fauna and Recreation Reserve. It should be considered within the planning if an upgrade of Old Base Road would provide part of the necessary buffers and interface between the Bannockburn Flora, Fauna and Recreation Reserve and the Growth Area.

██████ requests you consider the above comments in finalising the Growth Plan. ██████ does not oppose to the amendment and if required would be pleased to meet to discuss these matters in order to finalise the draft Planning Scheme Amendment documents.

For any further queries, you are welcome to call ████████████████████ or contact us by email to ████████████████████ for any planning and approvals matter.

Yours sincerely

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