

Victorian Planning Authority
Level 25, 35 Collins Street
Melbourne VIC 3000

Our Ref: 24324E

20th October 2025

By email: EastofAberline@transport.vic.gov.au

Dear Sir/Madam,

LANDOWNER DRAINAGE SUBMISSION: EAST OF ABERLINE PRECINCT STRUCUTRE PLAN (PSP)
75 BOILING DOWN ROAD, WARRNAMBOOL (PARCEL 24)
105 BOILING DOWN ROAD, WARRNAMBOOL (PARCEL 26)
135 BOILING DOWN ROAD, WARRNAMBOOL (PARCEL 27)
270-288 WANGOOM ROAD, WARRNAMBOOL (PARCELS 7, 9 AND 10)

We refer to the above matter and write on behalf of the landowner, Hyson Pty Ltd and Tarletons Pty Ltd (referred to as “Mondous Property” or MP, as the parent organisation) to make a submission regarding the draft Amendment C217warr, the East Abeline PSP and East Abeline Development Contributions Plan (DCP) and the proposed Ordinance currently being exhibited.

We represent MP in relation to six land holdings which are outlined in the enclosed landowner submission letter and shown in Figure 1 below.

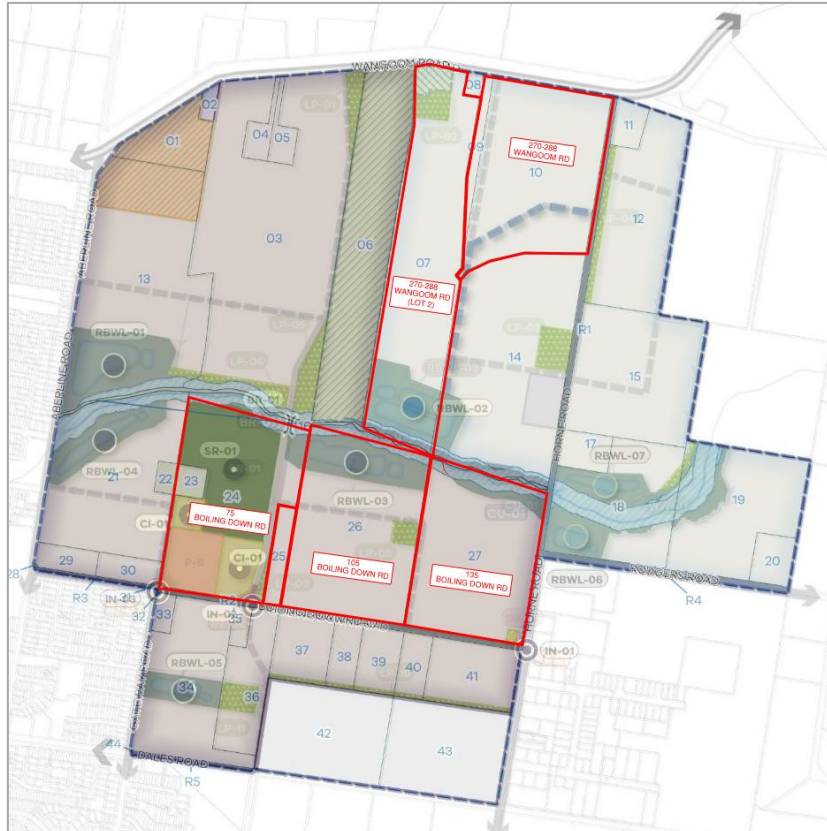


Figure 1: MP land holdings

This submission focuses on drainage-related matters relevant to MP's properties within the PSP area. It represents a preliminary high-level position and is not exhaustive. Further detail may be provided following additional review and consultation. This letter should be considered alongside the enclosed submission by our planning team dated 9th October 2025.

Drainage related matters:

1) PSP Requirement R31 – Flood Level and Freeboard Requirements:

- a) R31 currently requires compliance with GHCMa flood level requirements, including a minimum 300 mm freeboard above the 1% AEP (climate change) flood level
- b) In the context of ARR2019 (v4.2) climate change guidance, this reference appears generic and may lead to inconsistent application
- c) It is recommended that the PSP:
 - i) Specify the preferred "Day 1" ARR2019 (v4.2) climate change scenario and planning horizon (e.g., SSP2-4.5 2100 or SSP3-7.0 2100) consistent with GHCMa policy; and
 - ii) Acknowledge the evolving nature of climate change projections, allowing flexibility for future updates based on refined GHCMa or state-wide direction.

2) External Flow Management of Parcels 38 (north), 39, 40, 41

- a) The SMEC Stormwater Drainage Report (5 September 2025) indicates that Parcels 38 (north), 39, 40 and 41 form part of Catchment "C", together with Parcels 26 and 27, and discharge to Russell Creek.
- b) This configuration does not appear to align with the existing topography, as shown on the available contour information in Figure 2.
- c) Review of the existing contours shown in the SMEC report suggests that Parcels 38 (north), 39, 40 and 41 fall in a south-easterly direction, away from Russell Creek and toward the existing water storage ponds.
- d) These properties are shown to be serviced by a 1% AEP pipeline (DP-01) in Horne Road, which would divert runoff against the natural grade toward Russell Creek.
- e) It is unclear whether this catchment is proposed to be treated and detained within RBWL-03. If so, the need to treat, retard and transfer flows against grade may warrant further review.
- f) We request that VPA and SMEC clarify the current intent for this catchment and advise whether alternative, more cost-effective drainage options have been considered for servicing these properties?

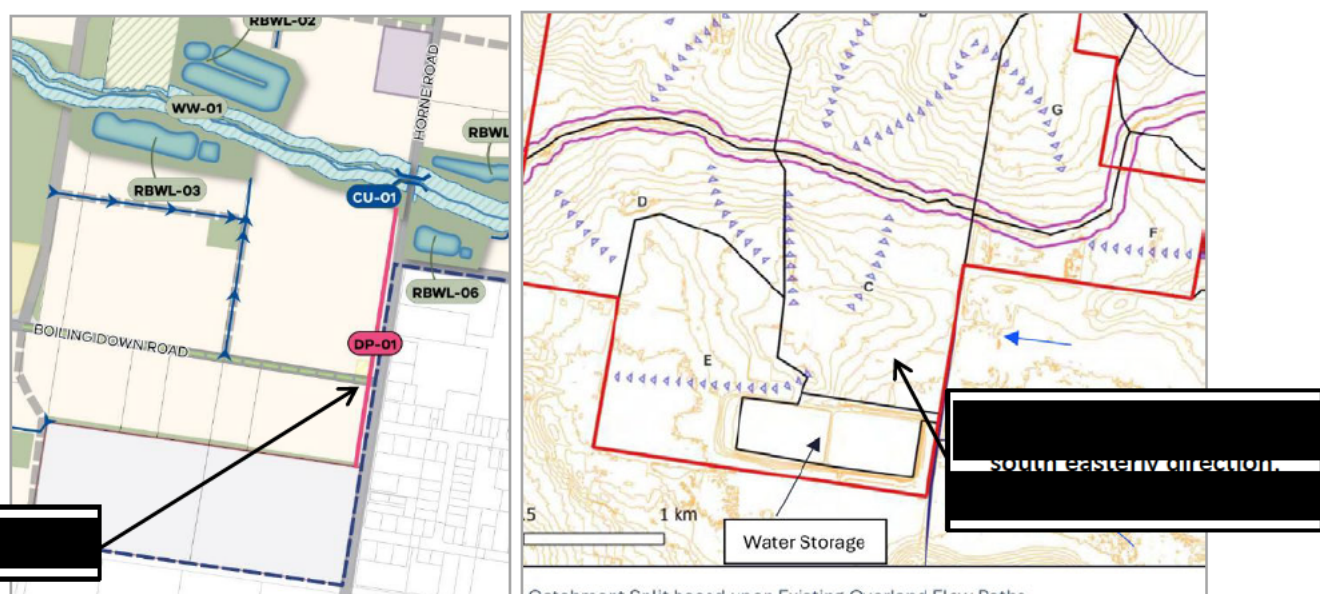


Figure 2: Topography and servicing of properties 38 (north), 39, 40, 41

Sources: PSP Plan 6 (left), SMEC report 5th Sep 2025, Figure 3-2 (right)

3) Drainage Reserve areas - RBWL-02 and RBWL-03

- a) The drainage reserve footprints for RBWL-02 and RBWL-03 differ notably between the SMEC Drainage Strategy Plan (Rev D) and the Stormwater Functional Design (Rev A), as shown in Figure 3.
- b) The PSP reserve areas appear to be based on the Drainage Strategy Plan, which seems conservative compared to later design refinements.
- c) Reeds acknowledges the substantial design work undertaken by SMEC and welcomes the opportunity to collaborate with VPA and SMEC to refine these drainage reserve areas prior to PSP gazettal.
- d) Preliminary review suggests potential optimisation of reserve extents without compromising function, stormwater treatment and flood protection outcomes.



Figure 3: Comparison of RBWL-02 and RBWL-03 Layouts

Sources: PSP Plan 6 (left), SMEC Drainage Strategy Plan Rev D (middle), SMEC Functional Design Rev A (right)

4) PSP Plan 12 – Infrastructure & Development Staging

- a) Parcels 7, 9 and 10 (270–288 Wangoom Road) are currently identified within Stage 2 of development, as shown in Figure 4.
- b) These parcels:
 - i) Have direct access to Wangoom Road,
 - ii) Are serviced by RBWL-02, and
 - iii) Can discharge to Russell Creek without reliance on upstream or downstream infrastructure.
- c) Subject to resolution of any non-drainage servicing constraints, these parcels appear capable of early delivery.
- d) Given the strategic contributions of these parcels to the PSP and the drainage self-sufficiency, it is recommended that the Stage 1 boundary, shown on PSP Plan 12 Infrastructure & Development Staging, be expanded to include Parcels 7, 9 and 10.

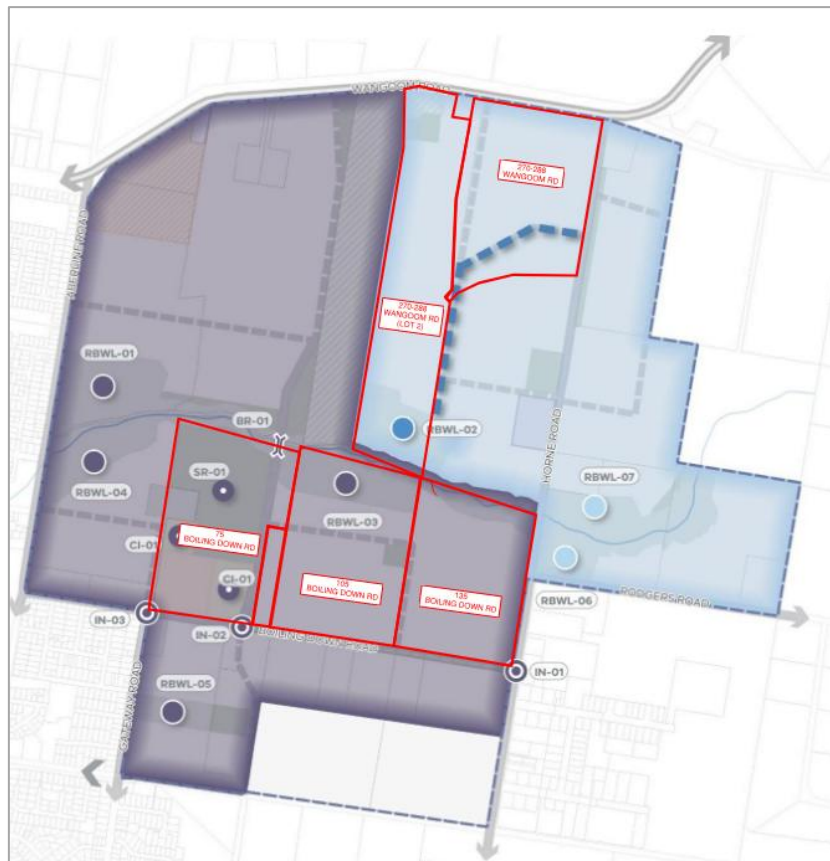


Figure 4: Infrastructure & Development Staging (Source: PSP Plan 12)

Please note that this is a high-level planning submission, and the concerns raised are not exhaustive and only represent the preliminary views of MP and further submissions may be made pending advice from external consultants or advisors.

Upon further assessment of the PSP and the supporting reports/background studies that informed the PSP together with ongoing consultations with the VPA, it is envisaged that additional feedback will be provided regarding MP's land holdings in due course. Expert witnesses will likely be engaged to represent MP at the Standing Advisory Committee, and it is anticipated that other issues with the PSP, DCP and supporting documents, will be identified.

Yours faithfully,
for REEDS CONSULTING PTY LTD

SASHA JELICIC
Associate | Manager Water Resources

Email: Sasha.Jelicic@reedsconsulting.com.au
Phone: 03 8660 3000
Mobile: 0473 507 513

Enclosed:
Landowner submission dated 9th October 2025

Victorian Planning Authority
Level 25, 35 Collins Street
Melbourne VIC 3000

Our Ref: 24324P

9th October 2025

By email: EastofAberline@transport.vic.gov.au
gareth.hately@transport.vic.gov.au
brianna.smillie@transport.vic.gov.au

Dear Sir/Madam;

LANDOWNER SUBMISSION: EAST ABERLINE PRECINCT STRUCTURE PLAN (PSP)
75 BOILING DOWN ROAD, WARRNAMBOOL (PARCEL 24)
105 BOILING DOWN ROAD, WARRNAMBOOL (PARCEL 26)
135 BOILING DOWN ROAD, WARRNAMBOOL (PARCEL 27)
270-288 WANGOOM ROAD, WARRNAMBOOL (PARCELS 7, 9 AND 10)

We refer to the above matter and write on behalf of the landowner, Hyson Pty Ltd and Tarletons Pty Ltd (referred to as "Mondous Property" or MP, as the parent organisation) to make a submission regarding the draft Amendment C217warr, the East Abeline PSP and East Abeline Development Contributions Plan (DCP) and the proposed Ordinance currently being exhibited. We outline in the table below the parcels for which this submission relates to:

PSP Parcel ID:	EA-07, EA-09 & EA-10
Land Address:	270-288 WANGOOM ROAD, WARRNAMBOOL
Registered Proprietor:	Tarletons Pty Ltd
SPI:	Lot 2 on PS710426F & Crown Allotment 11(Pt), 12 (Pt), Section E, Parish of Wangoom
Site Area:	EA-07 - 26.57 ha (Title) EA-09 & EA-10 combined – 23.84 ha (Title) Total – 50.41 ha (Title)
Proposed Land Use designation:	<u>Parcel EA-07</u> Area – 26.71ha Potential Conservation Reserve – 1.06ha Waterway and Drainage Reserve (within conservation) – 0.64ha Waterway and Drainage Reserve – 4.44ha Local Network Park – 1ha NDA – 19.57ha (73.28%) <u>Parcel EA-09</u> Area – 1.72ha NDA – 1.72ha (100%) <u>Parcel EA-10</u> Area – 22.01ha NDA – 22.01ha (100%) Total Parcel Areas – 50.44 ha (PSP)¹

¹ Parcel Areas must be updated to reflect Title Area.

PSP Parcel ID:	EA-24
Land Address:	75 BOILING DOWN ROAD, WARRNAMBOOL
Registered Proprietor:	Hyson Pty Ltd
SPI:	Lot 2 on LP116579
Site Area:	21.325 ha (Title)
Proposed Land Use designation:	Area – 22.08ha ² Arterial Road – 0.24ha Proposed Government School – 3.50ha Waterway and Drainage Reserve (within conservation) – 1.54ha Waterway and Drainage Reserve – 0.68ha Local Sports Reserve – 10.65ha Local Network Park – 0.22ha NDA – 2.03ha (9.18%)

PSP Parcel ID:	EA-26
Land Address:	105 BOILING DOWN ROAD, WARRNAMBOOL
Registered Proprietor:	Hyson Pty Ltd
SPI:	Crown Allotment 6, Section E Parish of Wangoom
Site Area:	24.27 ha (Title)
Proposed Land Use designation:	Area – 23.88ha ³ Waterway and Drainage Reserve (within conservation) – 1.33ha Waterway and Drainage Reserve – 4.56ha Local Network Park – 0.60ha NDA – 17.39ha (72.84%)

PSP Parcel ID:	EA-27
Land Address:	135 BOILING DOWN ROAD, WARRNAMBOOL
Registered Proprietor:	Hyson Pty Ltd
SPI:	Crown Allotment 5, Section E Parish of Wangoom
Site Area:	20.08 ha
Proposed Land Use designation:	Area – 20.62ha ⁴ Arterial Road – 0.01ha Government Services – 0.12ha Waterway and Drainage Reserve (within conservation) – 1.39ha Waterway and Drainage Reserve – 0.92ha NDA – 18.17ha (88.14%)

In support of this submission, we enclose the following:

- Title documents x 5
- Preliminary Risk Screen Assessment (PRSA) (Peraco Pty Ltd, dated 3 October 2025)
- TABLE 1: Initial Planning Review – East of Abeline PSP (draft)
- TABLE 2: Initial Planning Review – Schedule 1 to Clause 37.07 Urban Growth Zone
- TABLE 3: Initial Planning Review – East of Abeline Development Contributions Plan (DCP)

² Parcel Area must be updated to reflect Title Area.

³ Parcel Area must be updated to reflect Title Area.

⁴ Parcel Area must be updated to reflect Title Area.

The Preliminary Risk Screen Assessment (PRSA) is broken up into three documents, as follows:

- 03102025_Warrnambool_a: this is the main PRSA report which also includes copies of the PRSA Statements, figures, and tables.
- 03102025_Warrnambool_b: this contains all the other Appendices to the PRSA report (Appendix B to Appendix E)
- 03102025_Warrnambool_c: this contains the Executive Summary and copies of the PRSA Statements

In addition to our submissions outlined in the enclosed Tables, MPG requests that **Planning Scheme Maps 7EAO, 10EAO and 14EAO** must be updated to reflect the proposed audit areas as per the supporting PRSA. Currently, the EAO applies to all land parcels whereas the PRSA found that the potential contamination on site was limited to discrete areas. The Planning Scheme Maps should therefore be updated to reflect the findings of the PRSA which includes limiting the future audit areas and removing the EAO designation for Parcel EA-26 entirely.

Please note that this is a high-level planning submission, and the concerns raised are not exhaustive and only represent the preliminary views of MPG and further submissions may be made pending advice from external consultants or advisors. A separate submission may be made regarding engineering and drainage matters.

Upon further assessment of the PSP and the supporting reports/background studies that informed the PSP together with ongoing consultations with the VPA, it is envisaged that additional feedback will be provided regarding MP's land holdings in due course. Expert witnesses will likely be engaged to represent MP at the Standing Advisory Committee, and it is anticipated that other issues with the PSP, DCP and supporting documents, will be identified.

If you have any queries regarding this submission, please contact the undersigned on the details below.

Yours faithfully,
for REEDS CONSULTING PTY LTD

[Redacted signature block]

[Redacted contact details block]