

[REDACTED]

Dear Planning Department,

Thank you for the opportunity to provide feedback on the East of Aberline Precinct Structure Plan. Below I have collated a list of critiques of the plan, I hope you find this helpful.

## 1. Critique

### Housing typologies

- The 11.3% affordable housing target is ambitious for a regional context. Clearer delivery mechanisms, incentives, or housing partnerships may be needed.
- The housing mix (apartments/townhouses) may face slow market uptake given Warrnambool's preference for detached housing.

### Transport Dependence

- The PSP promotes active/public transport, but no firm commitments to expanded bus services are included. Without these, reliance on private vehicles may remain high.

### Cultural Integration

- While Eastern Maar values are acknowledged, there is risk of tokenism unless co-design partnerships are formally embedded. More binding requirements would strengthen delivery.

### Industrial Interface

- The Horne Road Industrial Precinct (INZ3) includes high-impact uses. Buffering strategies are acknowledged but lack explicit minimum standards for setbacks, acoustic treatment, and landscape screening. This could create future land use conflicts.

### Climate & Green Infrastructure

- The 30% canopy cover target is commendable but challenging given soil, climate and maintenance realities. More detail on irrigation, species selection and survival monitoring would improve feasibility.

### Community Services

- The PSP identifies schools and hubs but is lighter on health, childcare, and aged care provision, which will be vital for a community of this scale.

### Bushfire & Environmental Risk

- Bushfire Management Overlay applies to Tozer Reserve and is set to extend further. While acknowledged, the detail on enforceable design standards and vegetation management could be stronger.

### 3. Zoning & Overlay Considerations

#### Zoning

- Precinct sits within the **Urban Growth Zone (UGZ)**, enabling PSP implementation through the Warrnambool Planning Scheme.
- Industrial 3 Zone (INZ3) applies at Horne Road Industrial Precinct – a key land use conflict area.
- Transitional and low-density zones along the rural edge provide softer interfaces but may constrain yield.

#### Overlays

- **Bushfire Management Overlay (BMO):** Applies to Tozer Reserve and flagged for extension across its entirety.
- **Heritage Overlay (HO):** Recommended for 174 Aberline Road sandstone house remains.
- **Native Vegetation/Environmental constraints:** Russells Creek and Tozer Reserve corridors subject to vegetation retention and biodiversity overlays.
- **Water/Drainage overlays:** Integrated water management and flood storage requirements add constraints but also resilience opportunities.

### 4. Overall Summary

The East of Aberline PSP is ambitious and forward-looking, strongly aligned with state growth policy. Its strengths are in ecological integration, recognition of cultural values, and structured planning for housing and infrastructure.

However, delivery challenges exist:

- Affordable housing targets and higher-density typologies may struggle without stronger incentives.
- Transport plans rely on uncommitted bus services.
- Industrial interface conflicts require firmer planning controls.
- Overlays (bushfire, heritage, biodiversity) may constrain yield more than anticipated

