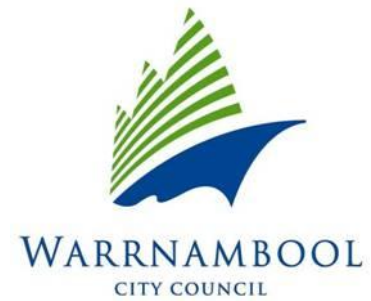


20 October 2025

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



DRAFT EAST OF ABERLINE PRECINCT STRUCTURE PLAN (AMENDMENT C217warr)

Thank you for the opportunity to make a submission in relation to Amendment C217warr to the Warrnambool Planning Scheme and specifically the draft *East of Aberline Precinct Structure Plan (PSP)*, *Development Contributions Plan (DCP)* and accompanying planning scheme provisions.

Warrnambool City Council (**Council**) are pleased to provide the following submission in response to Amendment C217warr (**the Amendment**).

In general terms, Council supports the progression and approval of the PSP and the Amendment, however there are some concerns regarding specific implementation matters that are outlined in this submission that we seek to be addressed.

Importantly, we believe that our requested changes will further improve the PSP's ability to deliver development in the short term whilst managing long term risk for Council.

This submission relates to the 'Exhibited Documents' that are available on the Engage Victoria website and seeks to outline each issue of concern and where possible a requested change(s) that we believe will enhance the deliverability of the PSP and DCP.

This submission has been structured to identify and explain Council's key issues with the PSP and DCP with a summary of our requested changes to the issues, under the headings currently utilised in the PSP. Where we have not been able to request a specific change, we look forward to working with the VPA over the coming weeks to determine the most appropriate change to address each issue.

We trust the contents of this submission are clear however, we look forward to working closely with the VPA to progress the approval of the East of Aberline PSP and DCP.

Submission

The following submission is provided to assist in enhancing the implementation of the East of Aberline PSP and DCP to ensure that the vision for the precinct can be delivered and there is a fair and equitable sharing of costs associated with projects that provide a broader benefit to the community.

Precinct Structure Plan

For ease of cross-reference, as much as possible, the below issues have been structured under the headings utilised in the PSP, with references made to the relevant Objectives (O#), Requirements (R#) and Guidelines (G#) as appropriate.

Viable Densities

Warrnambool's regional/rural character

While there are nine overarching aims stated in Section 2.2 as the 'PSP Purpose', we note that one of them seeks to support development "that reflects Warrnambool's rural character". This is particularly important given the precinct's location at the edge of the existing urban settlement boundary, and indeed LGA boundary. While Council is very aware of the need for housing diversity, we equally need to ensure that density is provided in appropriate areas, and delivered in a way that respects and responds to the existing character that has made Warrnambool a desirable place to live.

While we believe the density model as provided can lead to a suitable outcome, we support the inclusion of clearer direction as to how proposed average densities are likely to be deployed in order for the community to have certainty that a true range of housing diversity will be achieved without loss of a regional feel.

Affordable Housing

O3 seeks to facilitate 11.3% affordable housing. Council is supportive of the PSP encouraging the provision of affordable housing, however has concerns around the implementation of this as currently outlined in the PSP and Urban Growth Zone (UGZ) Schedule. Specifically, the breakdown of 'affordable housing delivery guidance' targets in Table 3 is rather prescriptive and may make it difficult to achieve. As such, it is suggested that Table 3 could be deleted. This table is also reflected in G7, which should be amended to delete this reference.

Requested Changes:

- Delete Table 3 – Affordable Housing Delivery Guidance
- Amend G7 to delete the words "... generally in accordance with Table 3 Affordable Housing Delivery Guidance."
- Amend R3 to include existing and surrounding patterns of built form as relevant 'precinct features and surrounding uses'

Amenity Buffers

The south-east portion of the Precinct interfaces with the Horne Road Industrial Precinct. This interface requires careful land use transition and buffering to manage amenity impacts from the high-impact uses within the industrial precinct. Appendix 3 *Environment Constraints Plan* identifies the existing asphalt plant within the industrial precinct and its associated 350m buffer, as well as a separate 'noise influence area' inside and out of the Precinct, as shown in **Figure 1** below.

We understand that prior to exhibition, the VPA had agreement from the EPA in relation to reducing/deleting amenity buffers to other high-impact uses within the industrial precinct. Council request further clarity around which other uses have amenity buffers that impact the Precinct and why any reduction/deleting is acceptable.



FIGURE 1: APPENDIX 3 ENVIRONMENTAL CONSTRAINTS PLAN (EAST OF ABERLINE PSP)

Safe, accessible and well-connected

Based on a review of the PSP and associated Integrated Transport Assessment (September 2025) prepared by O'Brien Traffic, there appear to be deficiencies in the proposed movement and transport networks both within the PSP and externally. Specifically, the key transport related issues include:

- Distribution of traffic generation
- Provision of new and upgraded transport infrastructure
- Transport Impact outside the Precinct
- Active Transport Provision
- Shared paths and creek crossings
- Proposed Road Cross-sections

Distribution of Traffic Generation

The O'Brien report appears to underestimate the amount of traffic increase in Moore Street - Cramer Street, Whites Road and McGregors Road as it generally assumes that traffic from the precinct will head south towards the Princes Highway. No ultimate traffic figures are provided for these three routes in the report.

Specifically, it is likely that a large portion of the 13,353 vehicles/day of total traffic generation from the Precinct accessing the CBD (refer table 8, pg 32) would use Boiling Down Road West-Aberline Road-Moore Street-Cramer Street; or Dales Road-Moore Street-Cramer Street to access the CBD as it is a more direct, and the shortest, route. There are no traffic lights along the route with easy left hand turn maneuvers until Banyan Street – compared to the Horne Road-Princes Highway route, which will have four sets of traffic lights. The Horne Road route is also significantly longer, and when travelling east along Boiling Down Road to access Horne Road, travel is actually in the opposite direction. The Moore Street – Cramer Street route is also the most direct route to Warrnambool College (a substantial destination in the AM and PM peaks), and it is a quick attractive route to the CBD. For return trips from the CBD / West Warrnambool at the 5 pm peak, the McGregors Road route is attractive with fewer lights, a shorter distance and an easy left turn on to Derby Street.

Further, there appears to be a typographic error in the daily traffic generation figure of 43,200 vehicles/day on pg 27 of the O'Brien report. Based upon an expected lot yield of 4,227 lots and generation of 9 vehicles/day, the estimated daily traffic generated by the Precinct should be 38,044 vehicles/day – which matches the figures in Table 4, on pg 28.

Requested Changes:

- O'Brien Traffic to review their traffic generation distribution model to reflect more realistic route choices, prioritising:
 - Moore Street – Cramer Street as a high-use CBD access route
 - Whites Road (AM peak) and McGregors Road (PM peak) as secondary routes.
- Correct the traffic generation figure typo on pg 27 to align with Table 4.

Provision of New and Upgraded Transport Infrastructure

The intersection at Horne Road and the Neighbourhood Activity Centre (NAC) is currently shown on Plan 4 *Movement Network* of the PSP (**Figure 2** below) as a 'controlled intersection (non DCP)'. An earlier version of the O'Brien report recommended traffic signals at this intersection. At a minimum, at least a roundabout should be provided for in this location, as well as potentially another roundabout between the NAC and Wangoom Road, at the local access street. We also suggest that additional intersection treatments (roundabouts) could be provided at Horne Road-Rodger Road, Aberline Road - Whites Road and between Russell's Creek and Wangoom Rd, as shown in the Figure below. Where these intersection treatments are non-DCP items, it should be clear what the delivery expectation is or what the trigger for these works is (which developer/s are expected to deliver the works).

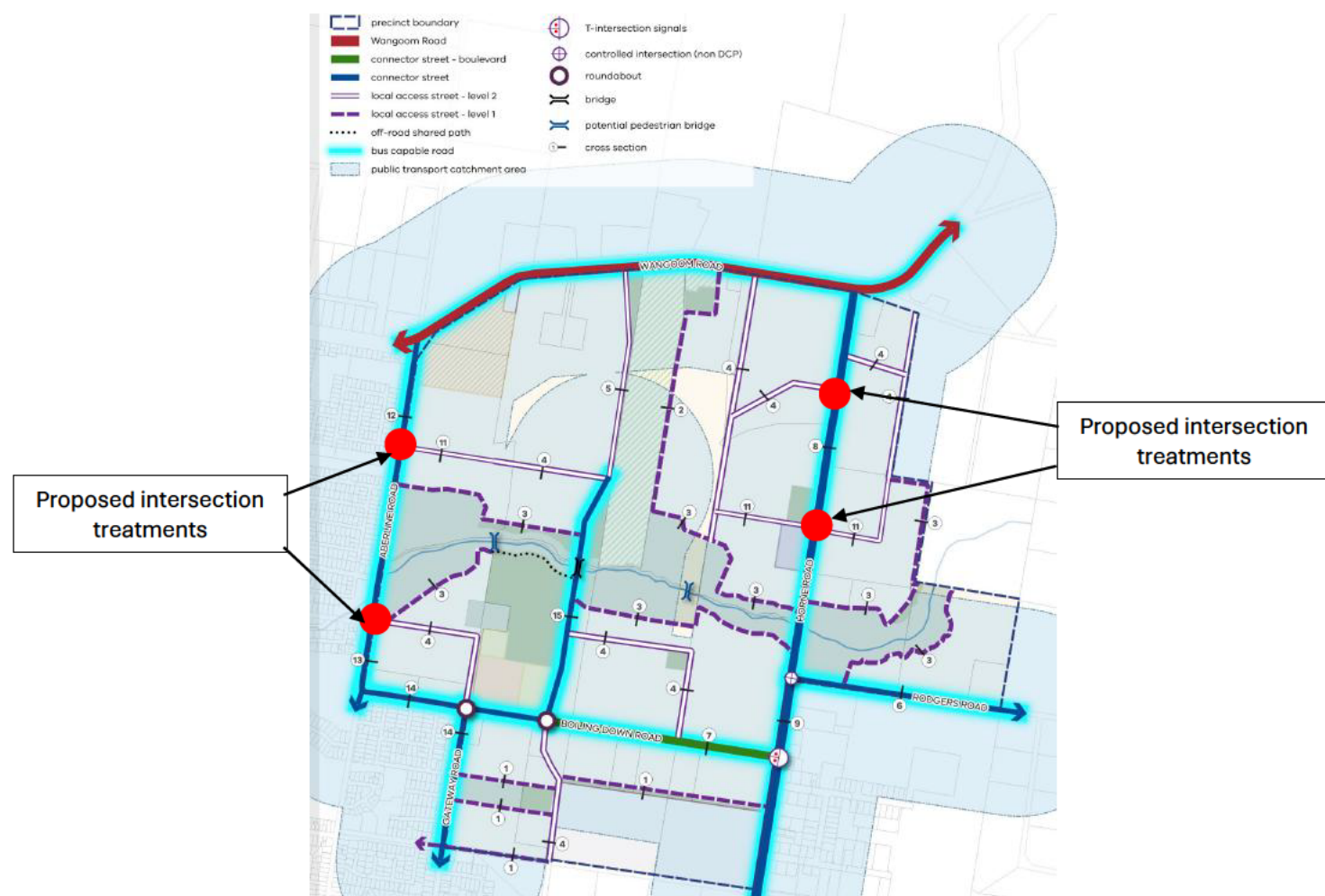


FIGURE 2: PROPOSED INTERSECTION LOCATIONS

Treatments at these intersections would assist safety in Horne Road by managing traffic conflicts at the intersections and by providing a lower speed environment along Horne Road, supporting the proposed speed limit of 60km/hr. If these intersections are not included in the DCP, Council is concerned that there will be conflict between developers over who must deliver each roundabout. In particular, the intersection at Horne Road-NAC is located between properties in different ownership, which may cause delivery issues.

The proposed north-south connector street central to the Precinct is identified as being bus-capable, but this does not appear to connect to anything. While this may have been intended to create flexibility for landowners, not having certainty around where this bus route is to connect into the broader network will leave Council open to debates about which developer is required to complete the bus link (and the associated increased structural pavement and road width).

Based on the redistribution of traffic generation, the traffic volumes on Horne Road are anticipated to reduce significantly. As such, the proposed signalised intersection at Horne Road-Boiling Down Road could be revised to a roundabout. This would result in a significantly lower project cost. If necessary, the roundabout could have a 2-lane entry and exit along Horne Road. Further, Council highlights that the geometry required for a roundabout allows for upgrading to a signalised intersection if required in the future, however the geometry for a signalised intersection (or a formalised cross intersection) does not allow for a roundabout to be delivered instead (insufficient splays).

Council believes that the recommended changes will ensure a more efficient and balanced road network outcome.

Requested Changes:

- O'Brien Traffic to consider inclusion of additional roundabouts at Horne Road and Aberline Rd, as identified in **Figure 2** above.
- Amend Plan 4 *Movement Network* to complete the 'bus capable' route along the north-south connector street.
- Consider changing IN-01 to a roundabout.

Transport Impact outside the Precinct

The East of Aberline Precinct is expected to accommodate between 4,000-4,500 new dwellings and support a population of approximately 12,000. This will result in a significant increase (35%) to Warrnambool's existing population – from 2021 census figures. Taking into consideration the redistribution of traffic movements outside the Precinct, as detailed above, the increase in traffic volumes is expected to have significant impacts on the operation of a number of intersections outside the Precinct, including:

- T-intersection at Moore Street-Garden Street
- T-intersection at Moore Street-Taits Road
- Single-lane roundabout intersection at Moore Street-Banyan Street-Mortlake Road-Jamieson Street-Botanic Road
- T-intersection of Moore Street-Cramer Street
- Multi T-intersection at Banyan Street-Cramer Street-Skene Street-Darling Street
- Cross-intersection at Mortlake Road-Wangoom Road-Grange Road
- T-intersection at Mortlake Road-Whites Road
- Offset T-intersections at Mortlake Road-Breton Street-Allan Street

A number of these intersections will need to be progressively upgraded as development within the Precinct occurs.

Separately, page 19 of the O'Brien report makes the following statement:

"A north-south connector street is to be provided east of Gateway Road, allowing connection from Dales Road to the Princes Highway. - There may be an opportunity to extend this street further north through to the PSP area"

The connection from Boiling Down Road (and Wangoom Road) to Dales Road and south to the Princes Hwy (through the Eastern Activity Centre) will provide a very attractive north-south route for local traffic all the way through the PSP. This road will need to have an appropriate cross section to accommodate for the increased traffic volumes anticipated.

Requested Changes:

- Following a redistribution of traffic generation (as outlined above), O'Brien Traffic to:
 - Reassess traffic impacts on Council-managed roads and intersections between the Precinct and the CBD
 - Consider whether any upgrades to external transport infrastructure need to be included in the PSP/DCP
 - Reconsider the cross-section of the road that connects Wangoom Rd to the Princes Hwy through the PSP and Eastern Activity Centre.

Active Transport Provision

The O'Brien report does not appear to consider that Wangoom Road is part of an on-road cycle training route (via Wangoom-Cudjee-Allansford-Warrnambool). Moyne Shire Council has widened Wangoom Road within its municipality to provide dedicated on-road cycling lanes.

Aside from the Wangoom Road footpath at the northern boundary of Tozer Reserve, there is no east-west connection through the 1170 metre-long reserve. Understanding that the Eastern Maar has not been supportive to access through Tozer Reserve due to the cultural significance of the reserve to their people, Council's preference would be for an 'indicative' shared path connection shown mid-way through the reserve as well as along the southern boundary of the reserve adjacent to the creek corridor. Council's concern is in the absence of formalised connections people are likely to make their own with potential unnecessary cultural and environmental damage in the process. As Council is not well positioned to take over management responsibilities for Tozer Reserve in entirety, we would also seek to establish a division of management responsibilities for any Council-managed assets adjacent to the reserve, where we assume this can be handled outside of the PSP.

Requested Changes:

- Acknowledge Wangoom Road's role in the cycling network
- Provide a cross section for Wangoom Rd.
- Show possible indicative future shared path connections midway through and to the south of Tozer Reserve.

Creek Crossings

Currently, the PSP only shows two proposed pedestrian bridges crossing Russells Creek, in addition to the existing road crossings of the Creek at Aberline Road and Horne Road and the proposed road crossing at the north-south connector street. This is not consistent with active transport creek crossings downstream of Aberline Rd where crossings are provided every 350 m on average. The most prominent gap in this PSP is on the eastern side of Horne Road. Even with the addition of this crossing the average gap between crossings through the PSP will be about 500 m.

Further, the identification of these crossings as "potential pedestrian bridges" is problematic. These should be identified as "shared path crossings" – noting that a crossing designed for pedestrians only is unlikely to be wide enough to accommodate cyclists. The word "potential" is also problematic as it gives the impression the provision of the crossings is optional.

Based on other existing simple creek crossings downstream of the PSP, Council believe these crossings could be constructed as culverts, rather than bridges, which would result in a significant reduction to the cost of these crossings – noting that Russells Creek flows in the PSP area are lower than at existing small crossings downstream.

There also appears to be insufficient detail to determine how these crossings are to be linked to the proposed shared path network.

As these crossings are not DCP projects, there are likely to be challenges ensuring their delivery. Council officers have already met with opposition from developers within the Precinct with regard to delivery of the crossings, and can see this being a key issue if the PSP does not clearly identify who is responsible for delivering these.

Requested Changes:

- Amend Plan 4 *Movement Network* to:
 - Rename 'potential pedestrian bridge' to 'shared path crossing'
 - Show an additional 'shared path crossing' on the eastern side of Horne Road
 - Consider adding the shared path crossings as a DCP project.

Proposed Road Cross-sections

Council has a number of concerns relating to the proposed road cross-sections in Appendix 5 of the PSP. These are summarised as below:

- Kerb width not considered in any cross-sections. This results in less space being available for canopy trees. The minimum nature strip width allowed in the IDM is 2.55 m. Council would prefer that all curb fronting residential driveways is semi-mountable (300 mm wide). All other kerb should be barrier (150 mm wide)
- Boiling Down Road vegetated central median (3m) will be difficult to safely maintain without closing the road. If it is essential that cross-turning traffic is prevented, there may be a better way to achieve that.
- Boiling Down Road footpath in service road median is unnecessary and should be deleted
- No Wangoom Road cross-section (but reference to this in Table 4 of the PSP)
- Aberline Road North of Russells Creek shows a shared path adjacent to the property line, which results in safety risk to cyclists (reversing vehicles from properties). It is also acknowledged that having a shared path immediately adjacent to parked cars or carriageways has its own risks. Further consideration of the shared path location may be beneficial.
- Consider providing service roads on both sides of Boiling Down Road, between Gateway Road and IN-02
- Dales Road hierarchy should be reconsidered based on updated traffic generation, and on it's specification on the Eastern Activity Centre PSP. Note that Dales Road is the extension of Fitzroy Road, Botanic Road and Moore Street which forms a continuous east-west connection across the city. The justification for not extending this connection has not been made clear.
- Trees should align with the kerbing rather than being set in the middle of the parking lane, with the kerb to deviate around them into the nature strip to allow greater separation from roots to road pavement, provide increased infiltration area, and greater protection of the tree from vehicles.
- Planting trees with a minimum mature height of 15 m close to concrete infrastructure and structural road pavements may prove problematic. It is important that Council arborists are closely consulted regarding species selection, root barriers, permeable areas and kerb design.

Requested Changes:

- Amend the road cross-sections at Appendix 5 of the PSP as outlined above.
- Include a cross -section for Wangoom Road.

Overhead Power

There are existing overhead power cables on Rodgers Rd, Horne Rd, Wangoom Rd, Aberline Rd, Boiling Down Rd, and Dales Rd. Relocation/undergrounding of overhead power can be very expensive. It is unclear if the locations of the existing power infrastructure are in conflict with any of the proposed road cross-sections.

Horne Rd Shared Path

The Horne Rd pedestrian and bicycle (and parking) infrastructure will ultimately need to extend from the PSP Area to connect with the existing infrastructure on the Princes Hwy. Although it is acknowledged that this is outside the PSP Area, having the need acknowledged in the Integrated Transport Assessment would assist with securing future funding.

High Quality Public Realm

Conservation Areas

R26 requires development on land within and abutting Russells Creek corridor and Tozer Reserve Conservation Corridor to prepare a Conservation Area Masterplan. Where land is abutting these corridors, but doesn't include any land within them, Council does not consider it necessary that a Conservation Area Masterplan be prepared – this should be limited to landholdings that include land in the Russells Creek or Tozer Reserve corridors.

Further clarity is also required in relation to the requirement to design these conservation areas in accordance with Growling Grass Frog (**GGF**) Habitat Design Standards. Council's understanding is that GGF were not found within the Precinct as part of the targeted surveys.

Public Open Space

Some of the local parks identified in Table 5 *Open Space* and Plan 5 *Public Realm* do not offer practical or useable public open spaces. Specifically, many of the local parks are non-standard shapes and sizes (eg. LP-01, LP-04, LP-05, LP-06, LP-07, LP-09, LP-10) and therefore will be constrained in providing for recreational use and facilities in these reserves. These parks are identified on **Figure 3** below.

In particular, LP-04 adjacent to Horne Road will be of limited practical use and does not accord with the objectives of Council's Open Space Strategy. The trees located within this reserve have all been cut back due to the powerlines and therefore provide limited canopy or other value. If this reserve was required for drainage purposes (overland flow), this should be identified as drainage land in the PSP rather than public open space. Council believes that an underground pipe for major flows in this area may enable a more practical open space geometry.

Currently the PSP proposes 7.77% of NDA as total credited open space, which exceeds the target of 5.17% specified in Councils' Open Space Strategy (draft). The additional open space creates a significant maintenance burden for Council. The size and location of the proposed local parks should be reconsidered to ensure Council is not burdened with land that is surplus to need and has little community benefit.



FIGURE 3: PLAN 5 PUBLIC REALM (EAST OF ABERLINE PSP)

Green linkage

In the agency validation report, a green corridor was proposed to connect the creek corridor with the green corridor at the rear (east) of the Horne Road Industrial Precinct. This link has been removed from the map. Acknowledging that an active transport link along Rodgers Road is possible, Council would like to further discuss how a northerly link to the creek can be secured.

Active Open Space

The PSP currently proposes one area of active open space SR-01, located centrally adjacent to the proposed community hub. This sports reserve is a non-standard size (10.65ha) and shape. In order to reduce surplus land associated with this reserve, a more standard size (8-10ha, as per the VPA benchmarks) and shape is recommended. Further, the concept plan for this reserve included in the DCP, as shown below, does not match the facilities proposed to be delivered in this reserve. Any reference to sports facilities not funded by the DCP should be deleted.

Council is not certain what form the playing fields and hard-court areas should take. Both the fields and courts should be identified in a more general way to enable flexibility in the sports which will be accommodated closer to the time of delivery based on need at that time.

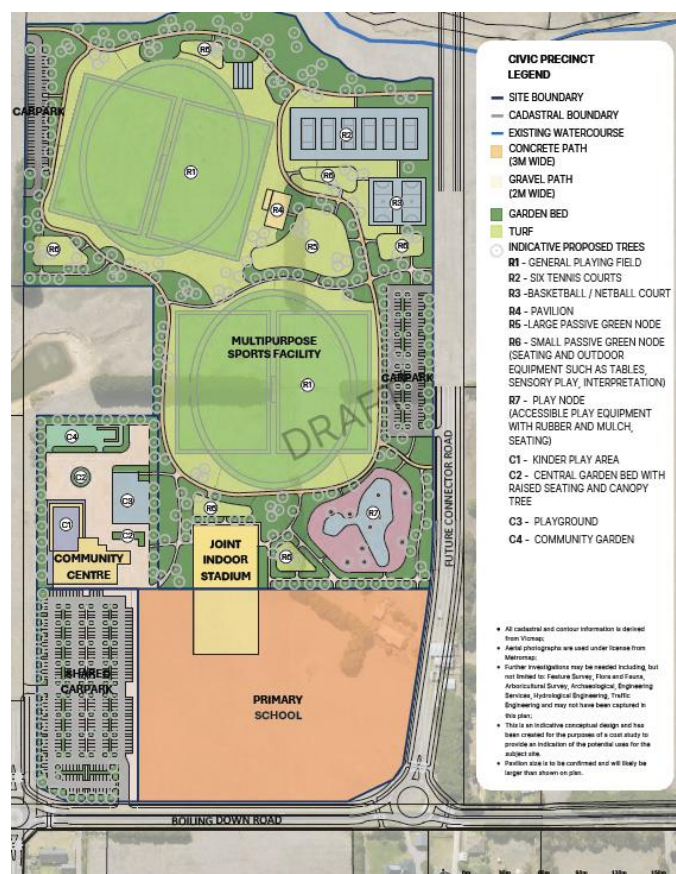


FIGURE 4: CIVIC PRECINCT CONCEPT PLAN (EAST OF ABERLINE DCP)

Health Facility

On PSP Plan 9 the legend shows a “health facility catchment” which seems to be centered around the Community Facility. This gives the community the impression that a health facility will be delivered in this location, whereas Council understands that there is no guarantee a health facility will be provided. It is requested this reference be removed as it creates a false expectation.

Drainage

The Aberline Road culverts must be lengthened to accommodate the additional road width proposed on the eastern side. The exclusion of this work from the DCP, which will benefit land whose traffic uses Aberline Road, will make it harder for Council to implement.

The Stormwater Drainage report prepared by SMEC (September 2025) indicates that major culverts will be required under Horne Road and Boiling Down Road (at low points other than Russells Ck), however these culvert works have not been included in the DCP. Where the culvert is necessary, and benefit multiple landowners, these works should be considered for inclusion as DCP projects.

The main drains, which convey the 1% AEP flow from the top of each catchment to the storage and treatment basins near the creek, have not been included in the DCP and are therefore anticipated to be delivered as developer-funded works. Where a main drain crosses developments or is located close to a boundary between developments, Council is concerned that excluding these costs from the DCP will result in implementation issues.

Clarification is also required in relation to the Crown land, which appears to be shown as 'drainage' land in some of the PSP plans (Plan 6 Water). Council suggest a different colour could be utilised for crown land to differentiate it.

R33 requires stormwater conveyance and treatment to be designed to avoid or mitigate the risk of erosion from sodic and/or dispersive soils. Council's understanding is that sodic and/or dispersive soils are not located within the Precinct, however seek confirmation whether the presence of these soils has been determined by the VPA.

Requested Changes:

- Amend the provision of public open space to ensure local parks are an appropriate size and shape to ensures these reserves are practical and useable.
- Consider reducing the total credited open space provision within the Precinct to align with Council's draft Open Space Strategy (5.17% of NDA).
- Consider reducing the size of SR-01 to reflect the actual facilities to be delivered in this reserve.
- Consider whether culvert works under Horne Road and Boiling Down Road or lengthening of the existing culverts under Aberline Road should be included in the DCP.
- Consider whether main drain costs should be included in the DCP.

Thriving Local Economies

Neighbourhood Activity Centre

R44 requires land use and development of the Neighbourhood Activity Centre (**NAC**) to respond to the relevant criteria and concept plans in Appendix 3 *Activity Centre Performance Requirements and Guidelines*. However, no activity centre concept plan is included in Appendix 3. Clarification is required as to whether concept plans will be prepared and included in Appendix 3, otherwise the wording of R44 should be amended to delete the reference to concept plans.

Development Contributions Plan

In addition to those items already discussed above, the following matters relate specifically to the DCP:

- Section 2.2 *Subdivision Act 1988* includes a reference to 3.81% and 3.83%. Confirmation is required as to why these figures differ and whether this is correct.
- Section 2.6 *Items not included in the Development Contributions Plan (development proponent works)* specifies that local parks must be provided by development proponents, including any landscaping to local parks. However, in Council's experience in other growth areas within the municipality, further detail is required to be included in this section as to the expectation for facilities and works to be provided within local parks. This will ensure developers are clear on what works are required to be provided within local parks before being handed over to Council.
- The project cost for BR-01 is currently specified as \$15,650,596 in the DCP. Council has evidence from a recent bridge project in the municipality to suggest the bridge cost has been overestimated. It is understood the VPA is considering constructing culverts rather than a bridge for the new road crossing over the creek. This is supported by Council as a cost saving measure.
- In Council's existing DCPs, insufficient or unclear triggers for delivery of DCP projects have resulted in some projects not being delivered when required. The DCP must provide clear direction as to the triggers for delivery of infrastructure, to ensure that these projects are delivered in a timely manner.

- Given that Boiling Down Road is the only east-west connector road through the Precinct, and links key destinations such as the school and community centre, consideration should be given to whether the road widening required should be included in the DCP. Note: The removal of the centre median will assist in addressing this matter.
- DCP projects costs should consider site-specific conditions (ie poor subgrade and rock floaters which are known to exist in the PSP area).
- Within the Project Cost Sheets at Appendix C of the DCP, a disclaimer should be added which states: “No allowance has been included for utility relocation works, geotechnical testing or WSUD.”
- The following items seem to have been excluded from cost estimates
 - Fencing around reserves.
 - The required pumping and irrigation infrastructure required for the stormwater harvesting from wetlands.
 - The cost of removing the material cut from retention basins from the PSP area. It is questioned that all of this material will be able to be used on-site.
 - Legal and compensation costs associated with the PAO.

Other Matters

Warrnambool Strategic Framework Plan

As part of the Amendment, the Warrnambool Strategic Framework Plan at Clause 02.04 of the Warrnambool Planning Scheme is being updated. Further changes to the Framework Plan are required. Specifically, the land north of Wangoom Road, between Aberline Road and Mortlake Road, needs to be removed from the ‘Future Urban Growth Corridor’. This land has significant stormwater drainage constraints which are unlikely to be resolved in the next decade. In 2018, Council adopted a report confirming that the area north of Wangoom Road will not become a residential growth area due to these constraints. This change has not been reflected in the exhibited documents. Further, Council is progressing the rezoning of the former Livestock Exchange and surrounding non-urban land (within the existing settlement boundary) to facilitate urban development. This should also be reflected in the updated Framework Plan.

Requested Changes:

- Update the Warrnambool Strategic Framework Plan at Clause 02.04 to delete land north of Wangoom Road (between Aberline Road and Mortlake Road) from the ‘future urban growth corridor’.

Public Acquisition Overlay

The Public Acquisition Overlay (**PAO**) is currently proposed to be applied to land identified as ‘drainage’, ‘sports reserve’ and the ‘community facilities’. Council is concerned that application of the PAO to the sports reserve and community facilities could trigger the acquisition of this land early by landowners, prior to sufficient funds being collected for the purchase of this land, and resulting in Council having to cover the cost.

Clarification is also required to confirm the approach to the two CI-01 projects, noting that they are proposed to be acquired under two separate PAOs, as shown in **Figure 5** below. Council is also concerned that applying the PAO to the community and sports facilities (POA1 & PAO2) may not align with the purpose of a PAO.

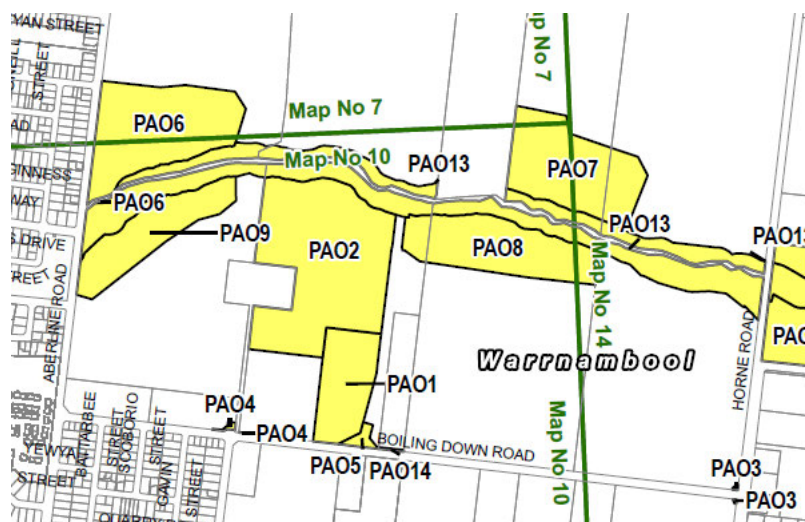


FIGURE 5: PROPOSED PAO MAP

Depending upon the agreed configuration of Boiling Down Road, there is a possibility that some PAO may also be required to ensure that configuration can be delivered.

Environmentally Sustainable Development (ESD)

As a member of the Council Alliance for Sustainable Built Environment (CASBE), Council has a focus on delivering elevated ESD outcomes. While it is acknowledged that some requirements and guidelines have been implemented into the PSP, Council believes that there is opportunity to strengthen these by linking to the *Zero Net Carbon Opportunities & Feasibility Report* (Hip v Hype 2020) that was prepared to support the PSP preparation process.

Through consultation with other CASBE member Councils, there appears to be inconsistency between the draft East of Aberline PSP and similar PSPs in other municipalities with regard to how ESD is treated.

An assessment of the PSP exhibited documents by Council's ESD advisor has identified that the PSP achieves 17 of the 46 Better Practice standards available under BESS Subdivisions. Two categories, Energy, and Climate Resilience, in the PSP have room for improvement, particularly in terms of meeting additional standards. The wording in the PSP report and planning scheme ordinances also requires revision to ensure that ESD-related standards are consistently integrated across objectives, guidelines, and requirements.

Requested Changes:

- Include the following placed-based objective for viable densities.
'To promote and facilitate environmentally sustainable development in subdivisions'. (sourced O4 from Ballarat North PSP)
- Include the Environmentally Sustainable Design Subdivision and Housing Design Guidelines in the PSP report and UGZ Schedule consistent with Ballarat North comments.
- Include "Canopy street tree calculation methodology" in Part4-Appendices.
- Consider implementation of further ESD Requirements and Guidelines.

In addition to these specific requests, Council requests further discussion on how ESD measures can be strengthened based on past work.

Ministerial Direction 22

It is not clear how the PSP report responds to the requirements of Ministerial Direction 22 especially in relation to Clauses 5 and 6 and 9? The purpose of MD 22 is to specify the matters relating to climate change a planning authority must have regard to in preparing a planning scheme amendment in accordance with section 12(2A) of the Planning and Environment Act 1987 (the Act).

Requested Changes:

Please clarify how the PSP addresses Ministerial Direction 22, or confirm how it has been exempted from it.

Stormwater Proof of Concept (SMEC Report)

The drying bench for Basin A will drain into the wetland rather than the sediment basin. Recent advice from Melbourne Water suggests this should not occur.

The drying benches have assumed that material will be able to be stacked to a depth of 0.5 m for drying. Recent advice from Melbourne Water suggests that 0.15 m is more likely and advantageous.

Treatment effectiveness has been modelled using the Melbourne Water MUSIC Guidelines. Warrnambool has its own MUSIC Guidelines.

The SMEC report states that a number of basins will be subject to encroachment in some flood events. Silt deposited by floodwaters can be very damaging to engineered wetlands with severe events requiring the wetland to be cleaned out and significantly replanted and reestablished.

Sediment basins have been sized using a sediment load of 1.6 m³/ha/yr. It is acknowledged that this is appropriate for a catchment that is fully constructed including houses and established gardens. For some of these catchments, construction sediment will be produced in much higher volumes for as much as 10 years with the sediment basins requiring cleaning much more frequently as a result.

The methodology assumes each residence will have a 2kL tank plumbed to toilets. It is unclear how this will be mandated.

The SMEC report recommends a DCP project for Russel Creek Corridor Improvements (revegetation). DCP Project WW-01 seems to only include land acquisition costs. No other DCP project seems to include any creek revegetation costs.

Figure 10-7 shows flooding in the southwest corner of the precinct. It is acknowledged that the amount of flooding is reduced by the proposed concept design. However, there should be no flooding of residential land in storms up to the 1% AEP in greenfield development such as this.

Section 10.2.3 suggests that there will be waterway realignments, in addition to the retarding basins as flood mitigation measures. It is not clear what these realignments will be, or how they are to be funded.

Precinct Name

There is a long strategic history of referring to the precinct as 'East of Aberline', however to our knowledge consultation has not been undertaken in either the original naming or its ongoing use.

Accordingly, Council has initiated informal consultation to understand if there is broad support for either the existing name, or an alternative. While we do not have any recommendations to offer at the time of writing, we would like to ensure there is an opportunity for community input before gazettal, should input be forthcoming.

Moore Street Closure For Horse Racing

At various times in the year Moore Street will be closed to enable horse races to occur. The most notable race requiring this is the Grand Annual which is Australia's longest steeplechase. Although these closures are outside the PSP and are temporary, they will certainly impact on traffic to and from the PSP Area. It is requested that they receive some consideration in the traffic reporting.

We trust the above information is sufficient for the DTP's review of the submission, however we reserve the right to provide additional information.

If our comments and recommendations are not supported, we would request the opportunity to discuss alternate changes to the Amendment documents.

Please do not hesitate to contact [REDACTED]
[REDACTED] if you have any queries.

Yours sincerely

