

To whom it may concern,

RE: East of Aberline PSP community consultation

Thank you for the opportunity to view the documents and make a submission on the exhibited PSP. I am a nearby landholder and also have many years of planning and environmental expertise.

Unfortunately the short consultation time frame of one month has made it difficult to properly review all of the provided documents, and I was initially unaware it had opened. As an immediately adjoining landholder to the precinct that will be impacted more than most, I would have appreciated earlier and longer consultation given the process has been underway for some time. I would still appreciate some additional time if possible to fully consider all of the documents.

However here are a few of my initial comments, without having read all of the documents:

VISION

On first reading of the PSP, it appears that the initial ambitious goals of the precinct being a high quality and 'green' precinct that were promoted early in the planning process have been replaced by something less ambitious. It would be good to see this vision retained as much as possible.

HOUSING

The density of proposed housing does not appear to fit the existing character of Warrnambool very well and is more aligned to growth areas closer to Melbourne (in terms of housing density, and especially given the location hard against the LGA boundary with a rural LGA, as well as the Urban Growth Boundary of Warrnambool). It also doesn't adequately respond to the objectives it states that it is aiming to achieve within the document itself ie protecting and improving the significant ecological values present within the precinct.

Overall planning

The principle of planning for the future growth of Warrnambool is positive, as is doing this at the precinct level and with a 20 minute neighbourhood in mind. Some elements of the plan have good intention – reduced housing density close to Tozer Reserve, connecting up open space corridors, and connected walking paths.

Tozer Reserve

An area of concern is the downplaying of the significance of Tozer Reserve. As a trained ecologist and over 20 years' experience regularly visiting the reserve, the ecological assessment didn't fully capture the significance of this site, as with any very short term assessment attempting to capture the value of a site from a couple of short visits. I will describe some of the values I am aware of in Appendix 1 to this

submission for your extra information. The consequence of this down-grading of values appears to be that the planning of the precinct has not adequately considered the actual values of the site, as this report helps inform the PSP.

Whilst a buffer to the reserve and active frontage to support safety and amenity is supported and beneficial, the size of the buffer is small from a biodiversity conservation perspective. A larger buffer would be preferable for a range of reasons – to avoid wildlife and traffic interactions, reduce development impacts on the environmental values of the reserve, and bushfire risk. Species selection and adequate management of this buffer for environmental purposes will be important to avoid weed encroachment and soil disturbance along the long boundary of Tozer Reserve.

Paths

It is good to see that connected paths are planned throughout the precinct and including along conservation areas. However the option of these being almost entirely on road will result in a lower amenity precinct. It is important for paths along Russells Creek to be shared paths, to contribute to the significant Russells Creek pedestrian and cycling corridor, and link the precinct to the urban centre in a sustainable way.

There is some grassy woodland vegetation present on parts of the Wangoom Road reserve. This is an important biodiversity corridor for the reserve, and should not be impacted with an off-road walking path.

Open Space

The amount of recreational open space provided is low considering the stated environmental and climate objectives. Whilst it is appreciated that large areas of developable land are required as bushfire or conservation buffers, there is still a strong need to provide adequate recreational open space given the housing density targets and goal of a 20-minute neighbourhood. By admission of the supporting documentation, it is lower than recommended, and lower than the stated target.

I would suggest at least a couple more well-designed local parks be provided away from Tozer reserve in addition to the spaces already provided close to it. This will reduce the number of people visiting the conservation reserve. Many species on the site are prone to impact through trampling (e.g. native orchids), and wouldn't tolerate a lot of off-path pedestrian use. The inclusion of destination locations away from the reserve will help avoid these impacts and protect the ecological functions of the reserve, as stated in the vision statement. Ideally, if residents in the precinct visit Tozer reserve, it will be primarily to walk along the outer boundary paths rather than use the reserve itself for recreation.

When the adjoining residential area was developed (corner Wangoom and Aberline Road), the lack of walkable open space access in the corner area was justified as the EoA precinct was due to be planned soon and there would likely be at least one local park within walking distance of those residents. However no local park is planned in the precinct in the area close to Aberline and Wangoom roads (a private school doesn't replace the need for a nearby local park).

Interface with adjoining areas

Land to the north of Wangoom road is used as a mix of informal low density housing (ie not zoned for housing) and a substantial-sized and intensive dairy farm. This area is also largely exotic grassland, posing some grassland fire risk to the north of the precinct.

It was difficult for me to find details of the proposed interface, but the overview plan didn't indicate any reduction in housing density closer to Wangoom Road on the eastern half of the precinct, as would be appropriate to soften this transition and avoid conflicts between rural and urban uses.

How much consideration has been given to the fact that a rural LGA is immediately over the road to what is a relatively high density housing proposal in the context of Warrnambool? (as commentary regarding this was hard to find.) Both the urban growth boundary and precinct boundary are hard up against the rural LGA boundary, currently zoned for farming use. Residents living in the precinct area were consulted, but in the immediately adjoining area of Moyne there has been no prior input into the current consultation process. Was a proper buffer considered to the adjoining LGA, or are there plans to move the LGA boundary? What are the long term plans for the land use along the north side of Wangoom Road? If Wangoom Road is the long term urban growth boundary, a softer transition should be proposed on its edge. If not, residents north of the road should receive greater consultation regarding the longer term city growth objectives of this area more broadly.

Roads

The intersection between Wangoom road and Hopkins highway can be quite dangerous under existing traffic densities at certain times of day. Specifically, cars trying to turn right from Wangoom Road onto the highway, or cars from Grange road attempting to turn right into Warrnambool often have to take risks to be able to join the highway. When I was regularly driving this way at peak times, I observed many near-misses at this intersection.

The addition of a further 15,000 people adjoining Wangoom road is going to greatly exacerbate this issue.

Has this intersection been considered in road upgrades required as part of the precinct plan?

Likewise, the existing intersection between Horne and Wangoom Roads can also at times be dangerous, and I have likewise observed near misses at this location. The speed of cars approaching from the Wangoom direction can be an issue on this blind corner if a car is turning right onto Wangoom road. The impact of 15,000 extra residents in this area also needs to be considered.

Wangoom road is also very regularly used by a mix of road users: cyclists (Wangoom Road being a major training route), walkers, cars, trucks, milk tankers, tractors, and other farm machinery.

Other

I have summarised additional comments on the PSP below, though admit the timeframe involved meant the list is not complete or comprehensive:

Section / statement	Response	Suggested changes
1 Context.		
North – Wangoom Road Wangoom Road defines the northern boundary of the precinct and functions as a key east– west rural arterial route. Land north of Wangoom Road is predominantly rural, with the PSP providing a soft urban–rural transition through the provision of local access street with shared path	I disagree that a soft transition has been provided. High density housing appears to be quite close to Wangoom Road.	
2 PSP outcomes		
2.1 PSP vision It is vital to Warrnambool's identity as a regional city blending coast and country	The exhibited plan does not blend coast and country or really contribute to this vision?	Maybe remove this statement?
The precinct will support the enhancement of ecological values and protect biodiversity corridors, particularly along Russells Creek and Tozer Reserve.	Agree with statement and sentiment. The details provided in the plan however don't support an outcome that will result in enhanced ecological values. The increased pressure caused by the planned devolvement will reduce ecological values, through the introduction of artificial light, weed encroachment, domestic animals, increased use for passive recreation.	Provide wider and appropriate conservation buffers to Tozer reserve, with appropriate non-invasive species in the buffer. Minimise the number of access points to Tozer Reserve from the precinct. Increase the quality and number of recreational / passive open spaces away from the reserve so the whole 15,000 aren't recreating along or in the reserve. Do not count Tozer Reserve in passive open space calculations or justification to provide less open space in the precinct.
A restored and interconnected habitat network will support the recolonisation of threatened species such as the Growling Grass Frog, while fostering broader environmental resilience. Conservation areas will provide vital ecological functions, incorporating wetland restoration, terrestrial habitat buffers, and hydrological enhancements to sustain local fauna and flora.	Agree with the concept. A buffer around Russells Creek is positive, and will provide a corridor for walking and wildlife. However the current plan looks like it will disrupt the hydrology of Russells Creek and Tozer Reserve.	
2.2 PSP purpose	The combination of diverse/social housing and a large bushland reserve is quite likely going to result in some antisocial behavior around Tozer Reserve. Has this been considered or discussed with reserve managers?	Reduce the proposed % of social housing – close to 10% is way above average, and would be better spread across Warrnambool as a whole, as concentrating it in one area is known to increase the chances of social issues.
The protection and enhancement of Russells Creek and Tozer Reserve as multifunctional landscape corridors that provide habitat for native species, manage water sustainably, and enable the long-term recolonisation of the Growling Grass Frog	Support the protection and enhancement statement. Question the multi-functional statement for Tozer Reserve – it is a conservation and education reserve. The rest of the plan doesn't strongly support this statement – the densities and configuration of infrastructure does not provide much evidence to support it being informed by this goal (with the exception of some co-location of open spaces and the	

	minimal conservation buffer to Tozer Resrve)	
Plan 2	Seems to be missing key elements from the rest of the plan e.g. local roads and buffer/pedestrian network treatments along each side of the Tozer Reserve boundary Co-location of wetlands with Russell's Creek a positive Co-location of active open space with Russells Creek corridor is positive No local recreation parks in whole NW corner? (the ones adjoining tozer are more conservation buffers) Overall appears to have an inadequate amount of proposed local parks given the higher density housing than most of Warrnambool and as an overview plan, doesn't seem to provide the environmental and livability outcomes that it is aiming to achieve. It appears that Tozer reserve is being relied on to provide public recreation and amenity (which is OK in small doses, less so for 15,000 residents) – when it is a conservation and education reserve above all else.	
Figure 1	There seems to be some inconsistencies in the calculations of open space in this summary vs other parts of the document and supporting documents, which is a bit misleading. It also falls short of the credited open space target, and elsewhere also suggests it falls short of the local residential park calculation. I would also question whether some of the proposed parks even fall in this calculation, they are more buffers for other reasons. On the other hand, I support the lower dwelling density and even reducing it further, as 30 per NDHA is far too high for the surrounding land use context.	
Table 3	A social housing goal of 9.7% in one residential area is too high (double the Vic average of less than 4% in most areas). I agree social housing supply has not kept pace with overall housing growth, but concentrating so much in one area has been shown elsewhere to create a range of social and public issues. In the context of the precinct surrounding Tozer Reserve and Russells Creek, and not providing the target recreational open space amount away from these reserves, this will also increase the chance of problems within Tozer Reserve, particularly as this housing is likely to be higher density (minimal backyards) and residents with a higher need for access to	Reduce the required target of 9.7% social housing and spread these across other areas of Warrnambool more equitably.

	public open space.	
R12 Roads abutting a community facility, school, or open space area, must be designed to achieve slow vehicle speeds and include pedestrian crossing points near these sites	Support this, especial next to Tozer Reserve. An active frontage to the reserve with an appropriate conservation buffer is appropriate to avoid back fences directly abutting the reserve (with negative safety and conservation outcomes)	
Upgrade to existing road network, including Aberline Road, Wangoom Road, Horne Road and Boiling Down Road in accordance with Plan 4 and Table 4 'Local Road Upgrade Implementation, which set out the process for delivering upgrades for the precinct traffic. The requirements will be implemented through subdivision permit conditions as determined by the responsible authority.	Has this considered a treatment at the Wangoom – Hopkins Highway intersection? This intersection is already a bit dangerous at peak times, and this will only compound the development. Cars attempting to cross from Grange Road have great difficulty safely joining, or cars aiming to turn right from Wangoom Rd onto the highway. There are ecological values north of Wangoom Rd that need to be considered, as does entry and exit to the productive dairy farm during construction works.	Wangoom Rd – Hopkins Highway intersection should be upgraded for safety purposes
Street layouts should create frame views to places of visual interest such as Tozer Reserve and Russells Creek, as identified in the Aberline to Horne Growth Corridor Landscape and Viewshed Assessment (prepared by Spiire January 2018)	Agree	
Development should include frontage roads to all edges of open spaces. Where frontage roads are not provided, an access way should be provided to the satisfaction of the responsible authority.	Agree	
Plan 4 Movement Network	Agree with the concept of active frontage to open space /conservation corridors in the precinct. Is there only 1 very small off road shared path next to Russells Creek? Proper off-road would create higher amenity, but understand this may be a necessary tradeoff.	
017 Ensure that bushfire risk is considered in the layout, staging and design of development (R22)	Support this and can see some of its implementation. Whilst connected wildlife corridors are important through Tozer and Russells Creek, it would be beneficial to consider fire risk to the north in infrastructure and plantings along the Wangoom Rd frontage to avoid increasing fire risk.	
R26 Development on land within and abutting Russells Creek corridor and Tozer Reserve Conservation Corridor must	Strongly agree with all of these. Would recommend the avoidance of soil disturbance and introduction of any running grasses e.g. couch, kikuyu or	

prepare a Conservation Area Masterplan Provide for the reinstatement of the hydrological conditions of Russells Creek and Tozer Reserve. Identify local parks and recreation areas occur adjacent to conservation areas to compliment the outcomes of the conservation area or biolinks. Design any public lighting to prevent light spill and glare within and adjacent to the potential habitat in accordance with the relevant guidelines	environmental weeds in these zones, and planting with EVC appropriate species (Plains Grassy Woodland, Plains Grassland species). Agree that hydrological conditions should be considered and reinstated.	
R26 Integrate the design of the conservation habitat/links with the opportunities for recreation and biodiversity-related learning	Agree, as long as it doesn't compromise the conservation values of the reserve. Locating a path either side of Tozer reserve is beneficial and also supported, as it encourages walking and shared amenity along the reserve rather than always in it.	
R27 Locate open space network and conservation links adjacent to significant landscape value areas, existing vegetation and waterways to create and enhance buffer area	Support in principle, but also need adequate recreation open space away from conservation areas so the large number of residents aren't all drawn there with poor conservation outcomes. Co-location of a looped and linked walking path along Russells Creek is strongly supported, and will connect the precinct to the rest of Warrnambool. If this goes through Tozer Reserve, work with the management committee to identify the best location (probably close to Russells creek but away from the floodplain)	
Incorporate existing ponds, where practical, and WSUD initiatives to maximise water use efficiency and long-term viability of vegetation	Support	
All parks and areas of open space must be located, designed and developed to the satisfaction of the responsible authority generally in accordance with Plan 5 Public Realm and Water and Land Use Budget, unless otherwise approved by the responsible authority	Suggests this may be open to change in future planning stages if the responsible authority agree.	
Drainage infrastructure must minimise impacts on biodiversity values and Aboriginal cultural values, particularly habitat for matters of national environmental significance located within conservation areas.	Support. Would suggest all constructed wetlands have wildlife-friendly access (screened if possible) to support wildlife in the precinct which will be impacted when stock troughs are removed.	
G19 Movement corridors for local	Agree corridors should be designed	

fauna and adjacent land uses should be designed and managed sensitively in accordance with a management plan, and to enhance community access and experience of the conservation and landscape value areas.	sensitively for wildlife. Community access to conservation areas – yes for Russells Creek (walking/cycling for recreation and transport), no increased access for Tozer Reserve (some well managed access, but don't need to encourage it).	
Subdivision layouts should include frontage roads to all edges of open spaces. Where frontage roads are not provided, an access way should be provided to the satisfaction of the responsible authority. This guideline does not apply where community hubs or drainage reserves front open spaces.	Support. Add the extra wording "include frontage roads to all edges of open spaces and conservation areas"	
Native vegetation identified on Plan 8 should be retained as far as practical to the satisfaction of the Responsible Authority.	Support where practical.	
G26,27 Crime Prevention Through Environmental Design (CPTED) principles, and in particular the provision of positive address and good passive surveillance from adjoining development, should guide the design of open spaces and associated infrastructure. A consistent suite of lighting and furniture should be used across neighbourhoods, appropriate to the type and role of street or public space to the satisfaction of the responsible authority.	Agree.	

Other comments:

When first viewing the document, it wasn't apparent at all that there were roads proposed either side of Tozer reserve (ie from looking at the Place Based Plan, which importantly is also the plan that will be implemented in the planning scheme). This should be updated to be clearer.

Thanks for considering my submission.

Yours sincerely

[Redacted Signature]

[Redacted Address]

Appendix: Environmental Values of Tozer Reserve to supplement the ecological assessment

Tozer Reserve has been restored over more than 20 years after it was found to contain remnant Plains Grassy Woodland after the removal of a pine plantation (though part of the reserve appears to have retained remnant vegetation long before that). I have been involved with site for that whole period, and have ecological expertise to make informed ecological observations (including of the significance of values observed).

The vegetation on site is still in a phase of recovery, and still moving through its successional stages. This means the vegetation on site is still changing year to year, including the number of species observed. I have been recording species on site for over 20 years now, and so far have found new species every single year. This is not due to a lack of observation effort, but due to the onsite conditions changing to provide the right conditions for these species to reemerge from the soil seed bank. The most recent species I have observed and recorded is *Ranunculus amplius*, which is a critically endangered wetland species and also found on nearby Maam Reserve.

Some of the key conservation values of the site are:

- it is believed to contain the largest population of *Dianella callicarpa* (endangered in Victoria and FFG listed) in existence. Whilst this species can reliably be identified during Spring flowering, its serrated leaves also assist identification at other times of year (other local species such as *Dianella brevicaulis* and *D. longifolia* have smooth edges to their leaves). In my estimation, there would be at least hundreds of individuals, if not thousands of this species present on the site. It has been steadily increasing numbers since the site has been managed for its conservation values, and is still actively recruiting. This population is quite significant in terms of protecting the overall population of this species under the FFG Act. It is also found on Maam Reserve and nearby roadsides ie Wangoom Road.
- Whilst some records have been captured in the VBA, the most up-to-date species list can be found in iNaturalist here
- (<https://www.inaturalist.org/observations?nelat=-38.356024838134225&nelng=142.53100583140485&swlat=-38.36699486014759&swlng=142.5260276514732> (copy and paste to browser)). As of October 14, this included: 1326 species observations; 369 unique species (300 native), 16 observers (with 225 identifiers who confirmed species IDs), 15 birds, 7 frogs and reptiles, 6 mammals, 1 small native fish in wetland (status near-threatened), 117 invertebrates, 189 plants (134 native), 30 fungi. As some species are hard to photograph, this is considered a minimum of what is present.
- it is by far the most biodiverse site in Warrnambool, despite its degraded state compared to the original. It has far more native plant species recorded than anywhere nearby, and for Warrnambool.
- Orchid species diversity – a remarkable number of native orchids have returned from the soil since restoration began, in addition to some species that have been observed consistently for over 20 years. The orchids would have emerged during the pine plantation period too depending on conditions. I have recorded 18 species including hybrids (see photos below), and photographed and documented them online for third party confirmation. Many of these species had not previously been formally recorded in Warrnambool, and are the only remaining locations of these species

anywhere near Warrnambool (most of them). It also includes one species that has not been formally recognised in Victoria (currently in the process), and occurs in a small area close to the reserve boundary (*Thelymitra pallidifrutus*)(access points should aim to avoid this area). Once it is recognised in Victoria, it is likely to end up listed as a threatened species.

- It is the largest Plains Grassy Woodland remnant in Warrnambool and anywhere close to it. The ecological report suggesting it didn't meet the benchmark for this EVC was undertaken at a time of year that couldn't back up this assessment, as it was based in part on ground flora diversity (May has about 7 times less ground flora diversity visible than in October). The vegetation is also undergoing a period of active change thanks to restoration, and the final values of the site are still emerging. This vegetation community is underrepresented in the current public reserve system (by previous state government assessments), and is at threat of extinction over time. All remnant areas are important. This one is of particular importance due to its location in one of the most cleared parts of Australia. My ecological expertise and knowledge of the site leads me to believe it may be an even rarer subset of the listed community, as the species present are different to sites further north on the Victorian Volcanic Plain.
- Wildlife – it is very likely Southern Bent-wing Bat foraging habitat given its proximity to the Starlight maternity cave. Foraging sites near maternity caves of this critically endangered species are extremely important, as they ensure that lactating bats don't have to travel too far from the cave to forage (they eat insects which are more prevalent in association with native vegetation). It is also an important corridor for species such as the koala. When koalas are caught in Warrnambool CBD, they must be released in the closest suitable habitat. This is currently Tozer reserve.
- The critically endangered short necked turtle has recently been recorded there from an old photograph (2007), and live turtles have been seen there at least twice since (most recently in 2022).
- There is a section of the reserve that is considered 'remnant' and wasn't under pines. With improved management, this area has transitioned to a Black Wattle overstory with 3 or more acres of predominantly chocolate lily understory that is visible in October. There are very, very few examples of remaining wildflower patches this large anywhere in the broader region (see some photos below).

Examples of grassland species in flower on Tozer Reserve in spring:



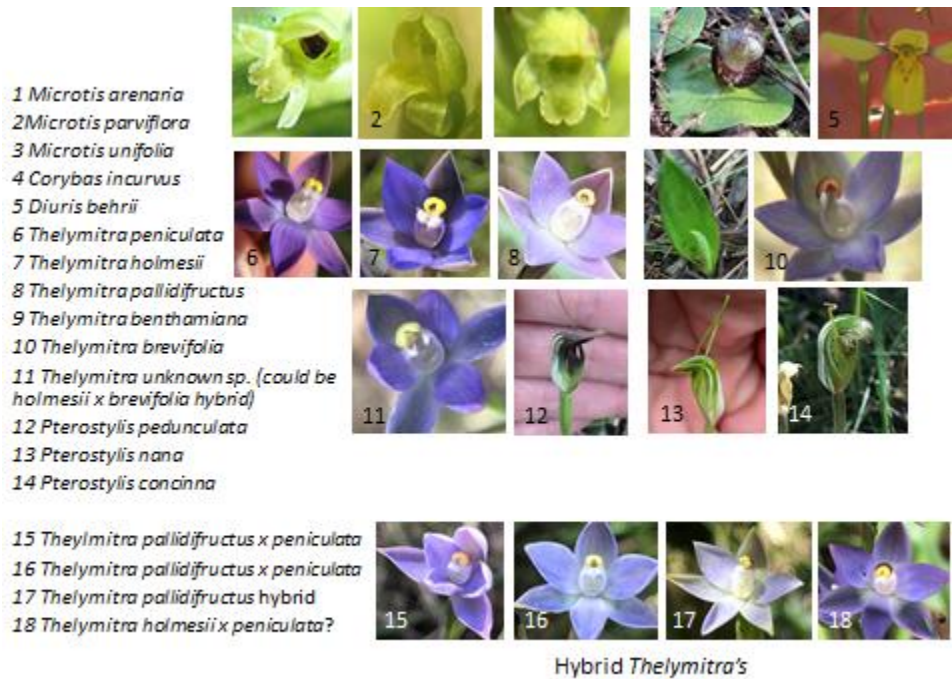
Areas that appear to have low diversity during the year (including May) are carpeted in chocolate lilies in October:



Orchid species found on Tozer Reserve (only flower under very specific seasonal, weather and time-of-day conditions):



Summary of orchid species recorded at Tozer Reserve:



Wetlands:





Emphemeral wetland on the east boundary in 2025 during dry conditions (above) and same site during wetter conditions below (2023), showing native *Rununculus* species in flower (the double trees shown in the middle of the first photo are toward the right of the second). As can be seen, the timing of a visit can make a huge difference to assumptions made during an ecological assessment.



A selection of indigenous species photographed on Tozer reserve from a recent presentation.

Wildflowers:



Fungi:



Invertebrates:

