



21 October 2025

Victorian Planning Authority
c/- East of Aberline Precinct Structure Plan
GPO Box 2392
Melbourne, VIC 3001

Dear Sir / Madam

**Draft Amendment C217warr, East of Aberline Precinct Structure Plan,
150 Horne Road and 53 Rodgers Road, Warrnambool**

1. This submission is prepared by Myers Planning & Associates (MPAA) on behalf of Credence Group Pty Ltd (150 Horne Road) and Lotus Capital Investments Pty Ltd (53 Rodgers Road) in response to Draft Amendment C217warr to the Warrnambool Planning Scheme, which seeks to introduce the East of Aberline Precinct Structure Plan (PSP), Development Contributions Plan (DCP) and associated planning controls.
2. MPAA is a Warrnambool-based town-planning and design practice with extensive experience in statutory and strategic planning across regional Victoria. Our practice represents a range of landowners and developers in the region, including parties directly affected by the proposed East of Aberline PSP.
3. The submission relates to land at 150 Horne Road and 53 Rodgers Road, Warrnambool. Together, these parcels form part of the eastern extent of the East of Aberline Precinct Structure Plan (PSP) area and directly interface with the Horne Road Industrial Precinct to the south.
4. The property at 150 Horne Road comprises approximately 14.04 hectares, while 53 Rodgers Road comprises approximately 14.99 hectares. Under the exhibited amendment, both parcels are proposed to be zoned Urban Growth Zone - Schedule 1 (UGZ1) and are affected by the proposed Development Contributions Plan Overlay (DCPO3), Environmental Audit Overlay (EAO), and a Public Acquisition Overlay (PAO) associated with proposed drainage infrastructure.



5. The land at 150 Horne Road is largely cleared of vegetation and has historically been used for agricultural purposes. The site contains areas of imported fill material, particularly south of Russells Creek, which have been identified as requiring further investigation prior to urban development. The exhibited PSP documentation also identifies this property as having a high risk of site contamination, warranting detailed assessment and management before any sensitive use or residential development occurs.
6. The land at 53 Rodgers Road is similarly cleared and gently undulating, containing a single existing dwelling located in the south-eastern corner of the site.
7. Both sites are currently used for low-intensity rural activities and are devoid of native vegetation. The combined landholding forms part of the transition between the established Horne Road Industrial Precinct and the planned residential areas to the north and west. Their location makes them a key interface area within the PSP - one where land-use separation and appropriate interface treatments will be essential to achieving a balanced planning outcome.

Proposed Land Use and Context

8. The exhibited East of Aberline PSP proposes that the subject land be developed primarily for residential use, supported by local open space and drainage infrastructure adjoining the Russells Creek corridor.
9. The land forms a key part of the transition between the Horne Road Industrial Precinct to the south and the planned residential neighbourhoods of the PSP to the north and west. It also occupies a strategically important intersection at Horne Road and Rodgers Road, identified in the Integrated Transport Assessment as a future signalised connector intersection - reinforcing the site's prominence as a gateway to the eastern precinct.
10. The exhibited PSP therefore positions the land at the critical interface between existing industrial operations and future sensitive residential uses, highlighting the need for careful consideration of land-use separation, noise mitigation, and appropriate land use transitions within this precinct.

Key Submission Themes

11. The submitter supports the intent of the East of Aberline Precinct Structure Plan (PSP) to deliver well-planned neighbourhoods supported by open space, drainage corridors, and community infrastructure. However, the exhibited PSP requires refinement to ensure that land-use, infrastructure and staging outcomes properly respond to the site's unique interface with the Horne Road Industrial Precinct and its associated amenity, contamination, and access considerations.

12. The exhibited PSP places sensitive residential uses directly adjacent to established industrial land, within an area identified by the Adverse Amenity Impact Assessment (GHD, May 2025) as being subject to measurable industrial noise impacts. This approach underestimates the operational realities of the adjoining precinct - which may include 24-hour or heavy-vehicle operations - and fails to acknowledge that compliance with night-time noise limits would likely preclude openable habitable windows facing the industrial interface. The result is a high risk of compromised residential amenity and liveability.
13. The Land Capability Assessment (Beveridge Williams, May 2025) identifies a high risk of contamination within 150 Horne Road due to imported fill. These environmental constraints, combined with the amenity impacts noted above, indicate that standard residential zoning along Horne Road and Rodgers Road is potentially unsuitable or, at best, constrained. While residential development may ultimately be achievable following detailed investigation and remediation, it would require significant mitigation measures and is therefore less appropriate than non-sensitive or mixed-use development that can be delivered earlier and with fewer environmental or amenity risks.
14. The intersection of Horne Road and Rodgers Road presents a logical and strategically significant location for a Neighbourhood Activity Centre (NAC) or mixed-use gateway precinct. The site combines visibility, accessibility and existing servicing with identified constraints that make it unsuitable for conventional housing. A main street-style mixed-use centre at this gateway would transform a constrained residential interface into a high-amenity focal point - featuring finer-grain retail and hospitality fronting the Russells Creek corridor and larger-format retail and parking to the rear along Rodgers Road.
15. Relocating the NAC to the Horne / Rodgers Road corner would better satisfy the PSP's own centre-location criteria. The site is adequately separated from the Eastern Activity Centre (EAC), centrally accessible to future PSP residents and existing neighbourhoods west of Aberline Road, and directly connected to arterial routes including Horne and Wangoom Roads. This location would support early service delivery, employment generation and a balanced land-use transition from industry to housing.
16. Infrastructure considerations reinforce this outcome. The Integrated Transport Assessment identifies the Horne / Rodgers Road intersection as a future signalised connector–arterial intersection - a key entry to the PSP that will carry both industrial and residential traffic. The traffic signals should therefore be recognised as a Development Contributions Plan (DCP) project, ensuring fair and transparent cost sharing across benefitting development fronts. In addition, a pedestrian and cycling link should connect the proposed NAC to the shared-path network planned along the eastern edge of the Horne Road Industrial Precinct and the Russells Creek trail system.

17. The submission also raises significant concerns regarding the drainage design, valuation and the application of the Public Acquisition Overlay (PAO) affecting RBWL-06, RBWL-07 and WW-01. The exhibited basins appear oversized and occupy strategically important land - including the prominent Horne / Rodgers Road corner. The use of a PAO is not supported, as it removes flexibility, risks land-locking land to the rear of 180 Horne Road, and undervalues land with clear commercial potential. Drainage should instead be delivered as DCP-funded infrastructure, with flexibility for integrated solutions such as underground detention beneath car parks or roads.
18. The exhibited PSP also assigns the subject land to Stage 2, implying a 20-25-year timeframe despite its immediate access to reticulated services. Bringing this area into Stage 1 would allow early delivery of critical stormwater infrastructure, accelerate housing and mixed-use development, and facilitate timely investment in the PSP's gateway precinct—without requiring additional infrastructure upgrades.
19. In summary, the submitter seeks that the PSP and associated planning controls be modified to:
 - a. Provide a clear land-use transition between the Horne Road Industrial Precinct and future residential areas.
 - b. Recognise and support the Horne / Rodgers Road gateway as the preferred location for a mixed-use and/or Neighbourhood Activity Centre precinct, incorporating employment, retail and higher-density residential opportunities within a high-amenity main street environment.
 - c. Review and refine drainage design, valuation and acquisition mechanisms affecting RBWL-06, RBWL-07 and WW-01 to ensure accurate valuation, preserve development flexibility and enable alternative integrated water-management solutions.
 - d. Designate the Horne / Rodgers Road traffic signals as a DCP-funded project and include a pedestrian-path link connecting the NAC to the eastern shared-path network and Russells Creek trail system.
 - e. Re-stage the subject land into Stage 1 to align with infrastructure readiness and deliver early activation of the gateway precinct.
20. Collectively, these refinements will deliver a balanced, resilient and well-connected urban structure—protecting industrial operations, supporting mixed-use and employment activity, and ensuring that future residential areas benefit from high-quality amenity, accessibility and early infrastructure delivery. The following sections of this submission discuss each of these refinements in further detail.

Land-Use Transition and the Opportunity for a Mixed-Use Gateway Precinct

21. The exhibited PSP designates the subject land for residential development directly adjoining the Horne Road Industrial Precinct, which accommodates a mix of industrial, logistics and service-based operations. This configuration creates a direct interface between established industrial activity and proposed noise-sensitive uses such as dwellings.
22. The Adverse Amenity Impact Assessment (GHD, May 2025) identifies the Horne Road and Rodgers Road frontage as falling within a noise influence zone. The report confirms that operations from the industrial and commercial areas to the south are expected to be perceivable within the PSP and may impose restrictions on noise-sensitive development. Despite this, the exhibited PSP relies primarily on built-form mitigation - acoustic fencing, glazing and facade treatments - to manage the interface. This approach underestimates the operational realities of adjoining industry, which continues to evolve and may include future 24-hour or heavy-vehicle operations. The assessment acknowledges that, to achieve compliance with the relevant night-time noise standards, habitable rooms such as bedrooms are unlikely to be capable of including openable windows facing the industrial interface. This creates a high risk that the amenity, ventilation and overall liveability of residential development in this area will be compromised.
23. The Land Capability Assessment (Beveridge Williams, May 2025) identifies a high risk of contamination at 150 Horne Road, primarily due to the presence of imported fill. These conditions will require investigation and remediation before any sensitive use can occur. Combined with the noise exposure and industrial adjacency, this limits the suitability of the southern land for immediate residential development and highlights the need for a non-sensitive transitional land use.
24. Access considerations further strengthen the case for a mixed-use or commercial outcome along this frontage. The Integrated Transport Assessment designates the Horne / Rodgers Road intersection as a future signalised connector-arterial intersection, providing a key entry to the eastern PSP. This high-exposure, high-access location presents a valuable opportunity for land uses that benefit from visibility and passing trade - such as retail, employment or community-based activities - rather than those reliant on residential amenity. When considered alongside the identified noise and contamination constraints, the accessibility of this intersection reinforces the site's suitability for a mixed-use gateway precinct that both capitalises on its prominence and provides a functional transition between industry and housing.
25. The Horne / Rodgers Road frontage is therefore a logical and strategically significant location for a Neighbourhood Activity Centre (NAC) within the PSP. It can accommodate a mix of commercial, employment and community uses compatible with higher ambient noise levels, while establishing a visual and functional buffer between industry and future housing. This site's gateway location also

presents an opportunity to create a main street-style precinct that delivers a sense of arrival into the PSP - one that integrates fine-grain retail and hospitality tenancies fronting the Russells Creek corridor, complemented by larger-format retail (such as a supermarket and car parking) positioned to the rear along Rodgers Road.

26. Although the Retail and Economic Assessment (Urban Enterprise, July 2025) identifies a preferred NAC further north, the Horne / Rodgers Road gateway offers a more balanced, accessible and employment-supportive outcome that better satisfies the PSP's own location criteria. The site maintains adequate spatial separation from the Eastern Activity Centre (EAC), ensuring a complementary rather than competing retail role; it is centrally accessible to the majority of future residents within the PSP, as well as to existing neighbourhoods west of Aberline Road; and it is directly connected to key arterial routes, including Horne Road and, by extension, Wangoom Road. Locating the NAC at this intersection would therefore:
- a. Transform a constrained residential interface into an activated mixed-use main street gateway that capitalises on site visibility and exposure;
 - b. Leverage the proposed traffic signals to provide safe and efficient access for residents, workers and visitors; and
 - c. Deliver early services, retail choice and employment opportunities, supporting a logical and staged development sequence across the PSP.
27. A mixed-use corridor extending north along Rodgers Road would reinforce this structure. The corridor could accommodate a mix of local retail, showrooms, community facilities and medium-density housing above or behind commercial frontages, creating a vibrant, walkable environment that transitions northward to conventional residential neighbourhoods beyond Russells Creek. This approach establishes a clear progression - from industry, to mixed use, to housing - while activating the creek corridor with north-facing public spaces and maintaining permeability and future neighbourhood integration.
28. The proposed traffic signals at Horne / Rodgers Road are integral to the success of this gateway and should be recognised as a Development Contributions Plan (DCP) funded project, reflecting their precinct-wide role in managing both industrial and residential traffic movements. Inclusion within the DCP will ensure a transparent and equitable cost-sharing framework across benefitting development fronts.
29. The PSP should also include a pedestrian and cycling link between the proposed NAC / mixed-use precinct and the shared-path network planned along the eastern edge of the Horne Road Industrial

Precinct. This short but critical connection would tie the gateway to the Russells Creek trail and the broader active-transport network, improving safety, accessibility and connectivity for workers and residents.

30. Collectively, these refinements recognise the southern gateway's layered constraints - noise influence, potential contamination and traffic function - and convert them into a strategic urban design opportunity. Establishing a mixed-use, main street-style NAC at the Horne / Rodgers Road intersection would optimise land-use efficiency, support local employment, protect residential amenity, and deliver a distinctive, high-amenity gateway consistent with Clauses 13.07-1S (Land Use Compatibility), 17.02-1S (Business), and 18.02 (Movement Networks) of the Victorian Planning Policy Framework.

Drainage Design, Valuation and the Need for Flexibility

31. The exhibited Development Contributions Plan (DCP) identifies three drainage infrastructure items affecting the subject land - RBWL-06, RBWL-07 and WW-01-proposed as retarding basins, wetlands and a section of creek corridor to be acquired through a Public Acquisition Overlay (PAO).
32. The size and location of these basins raise significant concern. RBWL-06 occupies a prominent corner at Horne Road and Rodgers Road - a location ideally suited for a Neighbourhood Activity Centre (NAC). Reserving this gateway site for drainage would sterilise land of high strategic, visual and economic value that should instead anchor the entrance to the PSP. The site was purchased at a premium in recognition of this corner's potential, and the PSP's assumptions fail to reflect that value.
33. RBWL-07, located immediately north of Russells Creek, presents additional functional issues. Its extent would remove access to the northern part of the subject land, situated behind 180 Horne Road, effectively land-locking this area and constraining development sequencing and internal connectivity. These implications highlight the need to review the configuration, scale and location of both basins to ensure they do not compromise broader planning outcomes.
34. The proposed basins also appear oversized relative to contemporary integrated water-management practice. Should 150 Horne Road be developed as the NAC, drainage could instead be accommodated through underground detention systems - for example, beneath car-parking areas or road reserves - supported by distributed water-quality measures along the Russells Creek corridor. These alternatives would maintain hydraulic performance while freeing valuable surface land for activation, amenity and public use.
35. The submitter also raises serious concerns about the valuation methodology adopted in the DCP. The exhibited cost tables and land-budget data are inconsistent and fail to account for the site's commercial

potential or strategic prominence. The values applied to RBWL-06 and RBWL-07 are unlikely to represent true market value or development potential, particularly given their gateway location.

36. The use of a Public Acquisition Overlay to secure these assets is not supported. The PAO is a blunt tool that removes flexibility to refine drainage design through later subdivision or engineering processes and critically risks land-locking parts of the subject land by fixing drainage alignments prematurely. The DCP provides an appropriate acquisition and funding mechanism; retaining both introduces duplication and potential inequity.
37. Draft Amendment C217warr, the PSP and the DCP should therefore be amended to:
- a. Remove the PAO from RBWL-06, RBWL-07 and WW-01, retaining them as DCP-funded projects only;
 - b. Review and refine the size, configuration and siting of the basins to avoid the loss of key gateway and access land;
 - c. Undertake a comprehensive valuation review to ensure fair compensation reflective of true market and development potential (including current development potential); and
 - d. Allow alternative drainage solutions, including underground detention and decentralised treatment, to be explored at the detailed-design stage.
38. These refinements would restore fairness, protect access and connectivity, and enable the creation of a high-amenity mixed-use gateway precinct while still achieving stormwater-management objectives consistent with best practice.

Staging and Infrastructure Delivery

39. The exhibited PSP places the subject land within Stage 2, suggesting a development timeframe of approximately 20-25 years. This staging designation is not supported. Given the site's proximity to existing reticulated water and sewer infrastructure - both located immediately south within the Horne Road Industrial Precinct - there are no servicing constraints preventing early development.
40. Bringing the land (particularly areas south and east of Russells Creek) forward into Stage 1 would deliver several strategic benefits. It would enable the early delivery of critical stormwater infrastructure required for the broader catchment, facilitate timely establishment of the proposed Neighbourhood Activity Centre (NAC), and accelerate the supply of new housing within an already serviced location.
41. There is no infrastructure-based justification to delay development of the subject land. Its inclusion in Stage 1 would support a logical and efficient development sequence, aligning infrastructure delivery with market demand and maximising early investment in the PSP's gateway precinct.

Conclusion

42. On behalf of our client, we appreciate the opportunity to provide input into draft Amendment C217warr and acknowledge the work undertaken by the Victorian Planning Authority (VPA), Warrnambool City Council, and associated consultants in preparing the exhibited documents.
43. This submission identifies several key matters that warrant further review prior to finalisation of the PSP, including the need for a stronger land-use transition along Horne and Rodgers Roads, the relocation of the Neighbourhood Activity Centre (NAC) to the southern gateway, refinement of drainage design and valuation processes, recognition of the Horne / Rodgers Road intersection as a DCP-funded item, and the re-staging of the subject land to enable early development. These refinements will deliver a more balanced, implementable and equitable outcome for both landowners and the broader community.
44. We are committed to working collaboratively with the VPA and Council to resolve these issues through the next stages of the PSP process. Should any matters remain unresolved following further discussions, the submitter wishes to retain its right to attend and present to the VPA Standing Advisory Committee.
45. We look forward to engaging further with the VPA to refine the PSP in a way that enables the timely and coordinated delivery of infrastructure, housing, and employment within a high-quality, well-planned gateway precinct at Warrnambool's eastern growth front.
55. Should you require any further information or wish to discuss the submission, please do not hesitate to contact me on [REDACTED]

Yours sincerely,

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